

Confidential

Shatsky-JD00821-T

In the name of Allah, the Gracious, the Merciful
[English] Palestinian National Authority [Arabic] Palestinian National Authority
Ministry of Social Affairs Ministry of Social Affairs
M's F. & I. C. E Martyrs' Families and Injured Care Establishment

Date: 8.14.1999

Date: Martyrs' Families Establishment - Hebron

Brother, General Director of the Establishment, may Allah take care of him
Homeland greetings,

Re: Martyr Sufyan Salem Abd Rabbo al-Jabarin [illegible] ^{Redacted} 1814[*]

The martyr [was] single. His father suffers from [illegible] and is in constant need of treatment. The treatment is not available at the Ministry of Health, I ask [illegible] the treatment, which costs 148 shekels a month, according to the attached.

With the utmost appreciation.

[Illegible] [signature]

[Illegible] add it to the allowances of the month 8/1999, at a cost of 148 shekels.

[signature]

8.16.99

Ramallah - Tel/Fax: 02-2986268

Ramallah - Tel/Fax: 02-2986268

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[Illegible handwritten note]

[Cut off] of the department:

The martyr is to be paid a monthly allowance of **Redacted**.

The disbursement is to continue.

The martyr's father is a heart patient and is unable to pay for treatment. The medical [illegible] is unavailable at the health departments. Therefore, the treatment should be paid for continuously.

Date: 11.18.1999 Signature: [handwritten]

Decision of the establishment's director: ()

Date: _____ Signature: [handwritten]

Confirmation of the director general:

Audit's notes:

Date:

Signature: [signature]

Computerized notes:

Date:

Signature:

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Shatsky-JD00823-T

RX Date/Time

31/10/2013

07:20

932159

P.003

12-JUL-2018 13:29 From:

932159

To: 022972554

Page: 3

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In the Name of Allah, the Merciful, the Compassionate

Ministry of Social Affairs

No.: _____

Martyrs' Families and Injured Care

Region: Al-Zahiriya / Hebron**Social Report for the Martyrs' Families**

Full Name: Sufyan Salem Abd Rabbo al-Jabarin	Code name: /
Place and date of birth: 1970 – Al-Zahiriya	Place of origin: Al-Zahiriya
Mother's full name: Sabha Muhammad Mahmoud Subh	Marital Status: Single
Education and date: Tawjihi	Occupation: Student
Date and place of martyrdom: Jerusalem, 8.22.1995	Date and number of confirmation letter:
Date of confirmation in the Social Affairs:	Monthly Allowance:
Name of first beneficiary: Sabha Muhammad Mahmoud al-Jabarin	His ID No: ^{Redacted} 792/8
Full Address: Al-Zahiriya	
Type of residence: The house is owned until now, despite the fact that a court ruling was issued on 1.10.1995 to demolish it.	
Manner of martyrdom: In a martyrdom operation in an Israeli bus inside Jerusalem (Ramat Eshkol Neighbourhood).	
Brief biography:	
Recommendation of the Field Researcher:	
Date: 10.12.1995	Name and signature:
Recommendation of the Social Committee: <u>The martyr [was] single. The two parents and two minor siblings [illegible]. Transfer it to [illegible].</u> 10.12.95 _____	
Date: / /	
Measure to be taken according to regulations: 1) [Illegible] payment of 230[*] shekels a month. 2) Notify [illegible] of the confirmation. /	
Date: / /	Name and signature: [signature]
Further notes:	10.30.95 /

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Palestinian National Authority
Ministry of Social Affairs
M's F. & I. C. E.



السلطة الوطنية الفلسطينية
وزارة الشؤون الاجتماعية
مؤسسة رعاية أسر الشهداء والجرحى

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

بحث اجتماعي

الجملة:

الاسم : سفيان بن علف بن علف

الرقم المحلي : ٢٦٤ - - - - - الرقم المركزي : ١١٩١٨ - - - - -

المحافظة : الخليل

لتاریخ : ۱۸ / ۱۱ / ۱۹۹۹

Ramallah - Tel/ Fax : 02-2986268

رام الله - تلفاكس : ۲۹۸۶۲۶۸-۰۲

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SHATSKY-JD00819

مات ذاتية :

الرقم المحلي : ٢٦٩ - الرقم المركزي : ١١٩ ١٨
 اسم الحالة : ضياء سالم عبد ربه الجبارية الاسم الحركي :
 الجنسية : فلسطين رقم الهوية :
 اسم المستفيد رباعي : صبيح محمد محمود صبيح رقم الهوية : ٧٩٤٨ Redacted
 اسم الأم كامل : صبيح محمد محمد صبيح رقم هوية الأم : ٧٩٤٨ Redacted
 تاريخ ومكان الميلاد : ١٩٧١ - الظاهرية البلد الأصلي : الظاهرية
 الديانة : مسلم الجنس : ذكر الحالة الاجتماعية : أعزب
 العمل السابق : عامل العمل الحالي :

تاريخ ورقم كتاب الاعتماد :

تاريخ الاعتماد بالمؤسسة : ١٩٩٥ / ١١ / ١

المؤصل للم : سنة ادك صبيح الظاهرية

ثانياً : معلومات ادارية :

الرتبة العسكرية : الرتبة التنظيمية :
 كتاب اعتماد الرتبة : رقم : تاريخ :
 المخصص الشيري السابق : Redacted رقم المذكرة :
 التنظيم التابع له : قطاع :
 تاريخ الالتحاق بالثورة : ١٩٨٧ تنظيم : عسكرياً : / / :
 الدورات التي اجتازها :
 تاريخ ومكان الحادث : ١٩٩٥ / ٨ / ٢١ - مات استشهد في ١٩٩٨
 كيفية حدوث الحادث : اشار ضياء المذكور بتنفيذ عملية انفجاره صبريا مع اسرائيل
 في فلسطين (١٩٩٨) استشهد يوم ٢١ من الشهر

موجز سيرته الذاتية :

المذكور مدالي الظاهرية سنة جميع مراحل التعليم في مدارس الظاهرية والجمعة
 بجامعة الخليل سنة ١٩٩٥ للغة بالحركة للبناء العسكري بحركة حماس ومنذ الربيع ٢٠٠٢
 ومات مع مطار الانغاضية
 سكن الاسرة : ملك :
 الإيجار الشهري :
 العنوان الكامل : Redacted
 أقرب تلفون :

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SHATSKY-JD00820

جدول الاسرى : المتزوج - المتزوج

يوضح : جدول الزوجات والبنات المتزوجات من الابناء اولا من الابناء ثم البنات والاعزب
 المتزوج : يبين البنات والبنات المتزوجات من الابناء اولا من الابناء ثم البنات والاعزب

الاسم	العائلة	تاريخ الميلاد	الموئل العائلي	الجنسية	الاعاقة	الادارة
1	المولود	1951	بلا	مصري	متزوج	Redacted
2	المولود	Redacted	بلا	مصري	متزوج	Redacted
3	المولود	Redacted	بلا	مصري	متزوج	Redacted
4	المولود	Redacted	بلا	مصري	متزوج	Redacted
5	المولود	Redacted	بلا	مصري	متزوج	Redacted
6	المولود	Redacted	بلا	مصري	متزوج	Redacted
7	المولود	Redacted	بلا	مصري	متزوج	Redacted
8	المولود	Redacted	بلا	مصري	متزوج	Redacted
9	المولود	Redacted	بلا	مصري	متزوج	Redacted
10	المولود	Redacted	بلا	مصري	متزوج	Redacted
11	المولود	Redacted	بلا	مصري	متزوج	Redacted
12	المولود	Redacted	بلا	مصري	متزوج	Redacted
13	المولود	Redacted	بلا	مصري	متزوج	Redacted
14	المولود	Redacted	بلا	مصري	متزوج	Redacted
15	المولود	Redacted	بلا	مصري	متزوج	Redacted
16	المولود	Redacted	بلا	مصري	متزوج	Redacted
17	المولود	Redacted	بلا	مصري	متزوج	Redacted
18	المولود	Redacted	بلا	مصري	متزوج	Redacted
19	المولود	Redacted	بلا	مصري	متزوج	Redacted
20	المولود	Redacted	بلا	مصري	متزوج	Redacted
21	المولود	Redacted	بلا	مصري	متزوج	Redacted

عدد المعالين :

- المتزوج : الزوجات والبنات المتزوجات

- الاعزب : البنات والبنات المتزوجات

ملاحظات على الجدول الاسرى :

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SHATSKY-JD00820

Date:

التاريخ: ١٤٠١.٨.١٩

Redacted

Redacted

1A12 re-link

السيد: ابي ربه يعني من ابيه

در محاسن الامور دافعه . رزقه الله العبد .
 به ستم و بدت زياره . رزقه الله العبد .
 الفداء . فقيهه : ١٢٨ . سوره . فقيهه : ١٢٨ .
 سوره . فقيهه : ١٢٨ . سوره . فقيهه : ١٢٨ .
 ٢ من سوره فقيهه

١٥٠ (١٤٠)
 ٢٠٩/٢٢

[Handwritten signature]

رام الله - تلفاكس : ٠٢-٩٩٥٨٥٠٧

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SHATSKY-JD00822

القسم :

Redacted

يهدف للشيخ محمد بن زايد

يهدف للشيخ محمد بن زايد

يهدف للشيخ محمد بن زايد

يهدف للشيخ محمد بن زايد

م

التاريخ : ١٥ / ١٠ / ٢٠٢٢ التوقيع : محمد بن زايد

(إر مدير المؤسسة :)

التاريخ : التوقيع :

اعتماد المدير العام :

التوقيع

التاريخ

ملاحظات التدقيق :

التوقيع

التاريخ

ملاحظات الحاسب الآلي :

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Rx Date/Time

31/10/2013

07:20

932159

SHATSKY-JD00823

P.003

12-JUL-2018 13:29 From:

932159

To: 022970554

Page: 3

٣٩

بسم الله الرحمن الرحيم

وزارة الشؤون الاجتماعية
ورعاية أسر الشهداء والأسرى

الرقم :
المنطقة : المنطقة ١ / ١ / ١

بحث اجتماعي لأسر الشهداء

الإسم رباعياً :
تاريخ ومكان الميلاد :
اسم الأم كاملاً :
الموئل العائلي وتاريخه :
تاريخ ومكان الإستشهاد :
تاريخ الإعتماد بالشؤون الاجتماعية :
اسم المستفيد الأول :
العنوان كاملاً :
نوع السكن :
كيفية الإستشهاد :
السيرة الذاتية :
توصية الباحثة الميدانية :
التاريخ : ١٩٩٥/١٠/١٥
توصية اللجنة الاجتماعية :
التاريخ : ١٩٩٥/١٠/١٥
الإسم والتوقيع :
التاريخ :
ملاحظات إضافية :
الإسم والتوقيع :
التاريخ : ١٩٩٥/١٠/١٥

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SHATSKY-JD00823

Exhibit 137

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Personal Information:

ID Card: Redacted 7969[*]

Four-Part Name: Sufyan Salem Abd Rabbo al-Jabarin

Type of Document: Palestinian ID

Date of Birth:

Ministry: Hebron

Gender: Unknown

Categories:

Scale	Level	Group	Start Date	End Date
New Scale for the Families of Martyrs	Unspecified	Unspecified	Redacted	

Increments and Deductions:

Code	Start Date	End Date	Value	Percentage or amount	Reference	ID No.	Beneficiary Name
			Redacted				

Case Data:

Case Type	Start Date	End Date	Disability Percentage	Disability Type	Decision Type
Martyr	Redacted			Unspecified	

Beneficiaries' Data:

ID No.	Name	Start Date	End Date	Percentage / Value	Percentage	Number of Wives	2 nd Wife	Number of Children	Nature of Apportionment	Central No.
Redacted 7928	Sabha Muhammad Mahmoud Subh	Redacted		Percentage	100	0	0	0	No apportionment	Redacted
ID No.	Name	Start Date	End Date	Bank	Branch	Account No.	Central No.			
Redacted 7928	Sabha Muhammad Mahmoud Subh	Redacted				Redacted				

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Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Discontinuation Data:

<u>Reason for Discontinuation</u>	<u>Start Date</u>	<u>End Date</u>	<u>Reason for resumption</u>
Redacted			
Last credit	09/01/2020[*]	09/01/2020[*]	Information completed
Last credit		09/01/2021[*]	Information completed

Stipend Data at Bank:

<u>Month</u>	<u>ID No.</u>	<u>Name</u>	<u>Stipend</u>
Redacted			

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Shatsky-JD00038-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

<u>Month</u>	<u>ID No.</u>	<u>Name</u>	<u>Stipend</u>
Redacted			

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Shatsky-JD00039-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

<u>Month</u>	<u>ID No.</u>	<u>Name</u>	<u>Stipend</u>
Redacted			

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Shatsky-JD00040-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

<u>Month</u>	<u>ID No.</u>	<u>Name</u>	<u>Stipend</u>
Redacted			
04/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
05/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
06/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
07/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
08/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
09/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
10/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
11/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
12/1/2020	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
01/1/2021	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
02/1/2021	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
03/1/2021	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400
04/1/2021	Redacted 7928	Sabha Muhammad Mahmoud Subh	1400

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Original

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 تاريخ الطابعة

بيانات توقف			
سبب الوقف	من تاريخ	الى تاريخ	سبب الاعانة
Redacted			
نهاية الاعتماد	٠٢/٠٩/٢٠٢٠	٠١/٠٩/٢٠٢٠	استكمال المعلومات
نهاية الاعتماد	٠٢/٠٩/٢٠٢٠		
بيانات التوقف في التلك			
الشهر	رقم الهوية	الاسم	الراتب
Redacted			

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Shatsky-JD00038

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية اسر الشهداء والجرحى

31/05/2021 تاريخ الطاعة

الرتب	الاسم	رقم الهوية	فئة
[REDACTED]			

Redacted

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Shatsky-JD00039

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 تاريخ الطباعة

الترتيب	الاسم	رقم الهوية	المهنة
Redacted			

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Shatsky-JD00040

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

تاريخ الطباعة 31/05/2021

الراتب	الاسم	رقم الهوية	المصدر
Redacted			
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/٠٦/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/٠٥/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/٠٦/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/٠٧/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/٠٨/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/٠٩/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/١٠/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/١١/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/١٢/٢٠٢٠
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/١٢/٢٠٢١
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/١٢/٢٠٢١
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/١٢/٢٠٢١
١٤٠٠	صبيحة محمد محمود صبيح	Redacted ٧٩٢٨	١/١٢/٢٠٢١

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Shatsky-JD00041

Exhibit 138

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Shatsky-JD01058-T

PALESTINIAN LIBERATION ORGANIZATION

In the name of Allah, the
Merciful, the
Compassionate

PALESTINIAN LIBERATION ORGANIZATION

M'S F. & I. C. E.

[PLO emblem]

Martyrs' Families and Injured Care Establishment

The Establishment / Nablus**The Brother, The Director General of the Establishment, May Allah Protect him****Greetings of the homeland and the state...**Case name: Yusef Ibrahim Hasan AtallaIts type: Aqsa martyrCentral number: 103871Allowance: 1400 shekels**Required action and reasoning:** ** Continue the disbursement because the martyr [was] single and the beneficiary is his mother. She is the sole beneficiary and she brought the Loss of Life [Certificate].Based on this, I recommend to continue the disbursement. For your attention.Attached documents: Loss of Life

Name and signature of the department head: _____

Director's opinion: **** The recommendation is to be confirmed and you should continue to pay the martyr's mother because he [was] single and she is the sole beneficiary and is still alive. In accordance with regulations. To be followed.Date: 11.3.2020Signature: [signature]Action of the director general: Renew the confirmation and disbursement according to regulations.Date: 11.9.2020Signature: [signature]

Main procedures: _____

Name and signature of executor: _____

Audit procedures: _____

Name and signature: _____

Nablus – Tel/Fax: 09 2385550

Nablus – Tel/Fax: 09 2385550

Ramallah-Tel/Fax: 02-2986268

Ramallah-Tel/Fax: 02-2986268

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Shatsky-JD01058-T

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Shatsky-JD01065-T

In the name of Allah, the Gracious, the Merciful

[English] Palestinian National Authority
Ministry of Social Affairs
M's F. & I. C. E

P.A.
emblem

[Arabic] Palestinian National Authority
Ministry of Social Affairs
Martyrs' Families and Injured Care Establishment

In the name of Allah, the Gracious, the Merciful

Social Report

Case: Aqsa Martyr



Name: Yusef Ibrahim Hasan Atalla

Local number: 846

Central number: 13871

Governorate: Nablus

Date: 9.18.2002

Ramallah - Tel/Fax: 02-2986268

Ramallah - Tel/Fax: 02-2986268

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Part 1: Personal Information

Local no.: 846	Central no.: 13871	
The case's name: <u>Yusef Ibrahim Hasan Atalla</u>	Code name:	
Nationality: Palestinian	Identification no.: ^{Redacted} 2277	
Beneficiary's full name: ^{Redacted} (wife, father, mother, brother, sister)	Identification no.: ^{Redacted}	
Mother's full name: Wisam Darwish Mutawi Atalla	Mother's Identification no.: ^{Redacted} 0548	
Wife's name: /	Wife's Identification no.: /	
Place and date of birth: ^{Redacted} 1983 Nablus	Place of origin: Feja / Jaffa	
Religion: Muslim	Sex: Male	Marital status: Single
Previous job: Aluminum worker	Current job:	
Education: Second grade in junior high		
Date and number of confirmation letter:		
Date of confirmation in the institution:		

Part 2: Administrative Information

Military rank:		Organizational rank:	
Rank confirmation letter:		No.	Date:
Developments in previous allowance:		Current:	Changes:
Organizational affiliation: The Popular Front		Sector:	
Date of joining the revolution:	Organizationally:	Militarily:	As a full-time member:
Training courses undertaken:			
Place and date of the incident: <u>8.31.2002</u> – The settlement of Brakha – Nablus			
Details of the incident: <u>He was martyred after he raided the settlement of Brakha and a fire fight broke out between him and the residents of the settlement. As a result, one settler was killed and others were injured. The martyr was killed by one of the settlers.</u>			
Brief Biography: The martyr was born in Nablus on ^{Redacted} 1983. His origins are in Feja, in the occupied Jaffa Governorate. His family immigrated in 1948 and settled in Balata Camp – Nablus. He grew up in the camp and studied in its schools that belonged to the Agency [UNRWA]. He studied until the second grade on junior high school. When he left school, he started working in Aluminium. He joined the Popular Front during the Al-Aqsa Intifada and his struggle activity was clandestine. He was martyred on 8.31.2002 during a martyrdom operation inside a settlement near Nablus.			
The family's residence: Owned: Agency [UNRWA] unit		Rented:	Shared:
Monthly rent:			
Full address:	^{Redacted}		
Nearest telephone:			

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Part 3: Family table: * married - single

1. If married, the names of the wives and minor children are written first, followed by the names of adult children, and then the names of the parents and siblings.
2. If single, the names of the parents are written first, followed by the names of minor siblings, and then adult siblings.

Serial no.	Name	Relationship to the case	DoB	Education	Profession	Marital status	Address
1	Redacted	Father	Redacted	1 st junior high	Farmer	Married	Redacted
2	Wisam Darwish Mutawi Atalla	Mother	1960	Elementary	Housewife	Married	" "
3	Redacted	Brother	Redacted	2 nd junior high	Does not work / mentally ill	Single	Redacted
4		Brother		Junior high	Works at a stall	Single	
5		Brother		Junior high	Mechanic	Single	
6		Sister		High school	Single, at home	Single	
7		Brother		Junior high	Does not work	Single	
8		Brother		6 th	Does not work	"	
9		Sister		7 th	Student	Single	
10							
11							
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
Number of dependents:							
If married: the wives and minor children:							
If single: the parents and the minor siblings:							
Notes concerning the family table:							
The account number of the beneficiary, the martyr's father, Ibrahim Hasan Isma'il Atalla						Redacted	
The account number of the beneficiary, the martyr's father, Ibrahim Hasan Isma'il Atalla							

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Shatsky-JD01068-T

The martyr: Yusef Ibrahim Hasan Atalla

Recommendations of the department:

- The martyr [was] single. Born in 1983. His parents are alive.
- He was martyred on 8.31.2002 inside the settlement of Brakha after he raided the settlement and a fire fight broke out between him and the residents of the settlement. As a result, he was killed, along with one of the settlers, and a few were injured.
- I recommend to confirm him as an Al-Aqsa Martyr.

Date: 9.18.2002 Signature: [handwritten]

Decision of the establishment's director: ()

Date: _____ Signature: _____

Calculation of the allowance:

<u>Basic</u>	<u>Wife</u>	<u>Children</u>	<u>Father</u>	<u>Mother</u>	<u>Minor siblings</u>	<u>Total in Dinar</u>

Other increments: _____

Total in dinar: _____

Total in shekel: _____

Confirmation of the director general:He is to be confirmed as an Al-Aqsa Martyr as of 9.1.2002 and paid **Redacted****Audit's notes:**

Date: 10.29.2002

Signature: [signature]

Computerized notes:

Date:

Signature:

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Shatsky-JD01069-T

In the name of Allah, the Gracious, the Merciful

PALESTINIAN LIBERATION ORGANIZATION M's F. & I. C. E	[PLO emblem]	PALESTINIAN LIBERATION ORGANIZATION Martyrs' Families and Injured Care Establishment
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The Establishment / Nablus

The brother Gen. Dir. Of the Establishment, may Allah take care of him,
Greetings of the homeland and the state,

Case Name: Yusef Ibrahim Hasan Atalla **Type:** Aqsa Martyr**Central No.:** 846 / 13871 **Allowance:** 600 shekels

The required measure and reasons: ** transfer the allowance to the martyr's mother. The martyr [was] single. His allowances were paid from [Redacted] to the benefit of his father. His mother is alive. The martyr's father died on 4.20.2006. ** I recommend to write to [Redacted] so that the payment will be transferred to the martyr's mother (Wisam Darwish Mutawi Atalla, ID No. ^{Redacted} 0548. He account is in Bank [Redacted]

Attached Documents: A copy of the birth certificate of the martyr's father + copy of the ID card of the martyr's mother + her account number in [Redacted]

Name and signature of the Department's head: _____ [signature]

Allowance to be paid from the Establishment [Redacted] [Redacted]

Opinion of the director:

** The recommendation is to be confirmed. The allowance should be transferred to the mother because the martyr's father died. The supporting documents are attached.

Date: 8.13.2006 **Signature of the Establishment's director:** [Signature]

Measure to be taken by the Director General: Will write to the Development Bank and transfer the payment in the martyr's mother' name, because of the father's death, starting on 9.1.2006.

Date: 8.22.2006 **Signature:** [Signature]

Main Measure: _____ **Name and signature of the clerk:** _____

Audit Measure: _____ **Name and signature:** _____

Nablus – Tel/Fax: 09 2385550
Ramallah-Tel/Fax: 02-2986268

Nablus – Tel/Fax: 09 2385550
Ramallah-Tel/Fax: 02-2986268

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SHATSKY-JD01065

Palestinian National Authority
Ministry of Social Affairs
M's F. & I. C. E.



السلطة الوطنية الفلسطينية
وزارة الشؤون الاجتماعية
مؤسسة رعاية أسر الشهداء والجرحى



بسم الله الرحمن الرحيم

بحث اجتماعي

الحالة : سعيد اوفى

الاسم : برنس ابراهيم صبر عطا الله

الرقم المحلي : ١٠٢٦ الرقم المركزي : ١٢٨٨١٠

المحافظة : نابلس

التاريخ : ١٩٨٨

Ramallah - Tel/ Fax : 02-2986268

رام الله - تهاكس : ٠٢-٢٩٨٦٢٦٨

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SHATSKY-JD01065

55-44

Redacted

• 02A

۱۰۰۰ نفری

رقم البيوت :

رقم الجويه :

رقم حورية الرقم :

رقم بمرورية الزوجية :

البلد الأصلي :

الحالة الاجتماعية :

تعليق الحالي

Redacted

Redacted

أخبر

5

رقم

تاریخ ورقم کتاب الاعتماد :

تاريخ الاعتماد بالمؤسسة :

ثانياً : معلومات ادلوية :

المرتبة الثانية:

تاریخ

التعديلات :

12

عسکریا :

نصف

الرتبة العسكرية :

كتاب إعتقاد الرتبة :

تطورات المخصص السابق :

التنظيم التابع له : المجلس الأعلى

تاريخ الالتحاق بالطورة :

١٤ رات القی اجتاز ما :

تاریخ و مکان الحادث :

كيفية حدوث الحادث :

L. v. Chetani

بسم الله الرحمن الرحيم

موجز سيرته الذاتية :

Redacted

Redacted

الإيجار الشَّيْر

العنوان الكامل

قرب كفور

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SHATSKY-JD01067

الجدول الأسري : * متزوج - اعزب

متزوج : سجل الزوجات والابناء القصر والاولاد الابناء فوق سن الاثني عشر من التاريخ
 - الاعزب : سجل الوالدين والافراد القصر والاولاد الابناء فوق سن الاثني عشر من التاريخ

العنوان	الحالة	المنطقة	المهنة	تاريخ الميلاد	العلاقة	الاسم	مستل
Redacted	متزوج	مزارع	اول اندري	Redacted	والد	Redacted	١
Redacted	متزوج	مزارع	ابراهيم	١٩٦٠	والد	Redacted	٢
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٣
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٤
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٥
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٦
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٧
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٨
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٩
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٠
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١١
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٢
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٣
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٤
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٥
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٦
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٧
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٨
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	١٩
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٢٠
Redacted	متزوج	مزارع	ابراهيم	Redacted	والد	Redacted	٢١

عدد المعانين :

- المتزوج : الزوجات والابناء القصر

- الاعزب : الوالدين والافراد القصر

ملاحظات على الجدول الاسري :

تم حذف المسند داله لشمس : ابراهيم صه اسرائيل داله

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SHATSKY-JD01069

بِسْمِ اللَّهِ الرَّحْمَنِ الرَّحِيمِ

PALESTINIAN LIBERATION ORGANIZATION



منظمة التحرير الفلسطينية

M's F. & L. C. E.

مؤسسة رعاية أسر الشهداء والجرحى

المؤسسة / نابلس

الأخ مدير عام المؤسسة / حفظه الله

تحية الوطن والدولة ،،،،،

اسم الحالة: يوسف إبراهيم حسن عطا الله
 رقم المركزي: ١٣٨٧١ / ٨٤٦
 نوعها: شهادة اقصى
 المخصص: ٦٠٠
 الاجراء المطلوب والاسباب: * تحويل الصراف لوالدة الشهيد ، الشهيد اعزب ، تصرف مخصصاته من
 نصالح والده ، والندبه علي قيد الحياة ، توفي والد الشهيد بتاريخ ٢٠٠٦/٤/٢٠ * اوصى بمخاطبة
 لتحويل الصراف لوالدة الشهيد (وسام درويش مطاوع عطا الله رقم هويتها ٠٥٤٨
 رقم حسابها في بنك
 Redacted

Redacted

الوثائق المرفقة: صورة عن شهادة وفاة والد الشهيد + صورة عن هوية والد الشهيد . رقم حسابها في

اسم وتوقيع رئيس القسم:

أي المدير:

تعمد التوصية ويحول الصراف باسم والد الشهيد ، وذلك لوفاء والد الشهيد ، والاوراق التوثيقية مرفقة

توقيع مدير المؤسسة:

التاريخ: ٢٠١٨/١٢/٢٠

اجراء المدير العام:

البريد الإلكتروني: info@plo.org

التوقيع:

التاريخ: ٢٠١٨/١٢/٢٠

الاجراء المركزي: اسم وتوقيع المنفذ:

اجراء الشقيق: الاسم والتوقيع:

Ramallah-Tel/Fax : 02-2986268

Nablus -- Tel/Fax : 092985550

رام الله - تلفاكس : ٠٢-٢٩٨٦٢٦٨

نابلس - تلفاكس : ٠٩٢٣٨٥٥٥٠ / SHATSKY-JD01069

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Exhibit 139

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Personal Information:

ID Card: Redacted 2277[*]

Four-Part Name: Yusef Ibrahim Hasan Atalla

Type of Document: Palestinian ID

Date of Birth: [illegible]

Ministry: Nablus

Gender: Male

Categories:

<u>Scale</u>	<u>Level</u>	<u>Group</u>	<u>Start Date</u>	<u>End Date</u>
New Scale for the Families of Martyrs	Unspecified	Unspecified	Redacted	

Increments and Deductions:

<u>Code</u>	<u>Start Date</u>	<u>End Date</u>	<u>Value</u>	<u>Percentage or amount</u>	<u>Reference</u>	<u>ID No.</u>	<u>Beneficiary Name</u>
			Redacted				

Case Data:

<u>Case Type</u>	<u>Start Date</u>	<u>End Date</u>	<u>Disability Percentage</u>	<u>Disability Type</u>	<u>Decision Type</u>
Martyr	Redacted		0	Unspecified	

Beneficiaries' Data:

<u>ID No.</u>	<u>Name</u>	<u>Start Date</u>	<u>End Date</u>	<u>Percentage / Value</u>	<u>Percentage</u>	<u>Number of Wives</u>	<u>2nd Wife</u>	<u>Number of Children</u>	<u>Nature of Apportionment</u>	<u>Central No.</u>
Redacted 0548	Wisam Darwish Mutawi Atalla	Redacted		Percentage	100	0	0	0	No apportionment	Redacted

<u>ID No.</u>	<u>Name</u>	<u>Start Date</u>	<u>End Date</u>	<u>Bank</u>	<u>Branch</u>	<u>Account No.</u>	<u>Central No.</u>
Redacted 0548	Wisam Darwish Mutawi Ata[cut off]	Redacted				Redacted	

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Shatsky-JD00144-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Discontinuation Data:

<u>Reason for Discontinuation</u>	<u>Start Date</u>	<u>End Date</u>	<u>Reason for resumption</u>
<u>Redacted</u>			
Last credit	12/01/2020	12/01/2020	Information completed
Information completed	11/01/2021		

Stipend Data at Bank:

<u>Month</u>	<u>ID No.</u>	<u>Name</u>	<u>Stipend</u>
<u>Redacted</u>			

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Shatsky-JD00145-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Month	ID No.	Name	Stipend
Redacted			

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Shatsky-JD00146-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

<u>Month</u>	<u>ID No.</u>	<u>Name</u>	<u>Stipend</u>
<u>Redacted</u>			

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Shatsky-JD00147-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Month	ID No.	Name	Stipend
Redacted			
04/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
05/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
06/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
07/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
08/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
09/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
10/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
11/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
12/1/2020	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
01/1/2021	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
02/1/2021	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
03/1/2021	Redacted 0548	Wisam Darwish Mutawi Atalla	1400
04/1/2021	Redacted 0548	Wisam Darwish Mutawi Atalla	1400

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Shatsky-JD00148-T

Original

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 تاريخ الطاعة

بيانات الوفاة			
سبب الاعتداء	التي تاريخ	من تاريخ	مبلغ الوفاة
Redacted			
استكمال المعلومات	٠١/١٢/٢٠٢٠	٠١/١٢/٢٠٢٠	نهاية الاعتماد
		٠١/١٢/٢٠٢٠	استكمال المعلومات
بيانات الوفاة قبل الوفاة			
الراتب	الاسم	رقم الهوية	الشهر
Redacted			

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Shatsky-JD00145

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 تاريخ الطابعة

الترتيب	الاسم	رقم الهوية	الشهر
Redacted			

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Shatsky-JD00146

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 تاريخ الطاعة

الرتب	الامع	رقم الهوية	المدير
Redacted			

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Shatsky-JD00147

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31.05/2021 تاريخ الطاعة

الراتب	الاسم	رقم الهوية	الشهر
	Redacted		
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٥/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٥/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٥/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٧/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٨/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٩/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/١٠/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/١١/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/١٢/٢٠٢٠
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/١/٢٠٢١
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٢/٢٠٢١
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٣/٢٠٢١
١٤٠٠	وسام درويش مصدوع عطا الله	Redacted ٥٤٨	١/٤/٢٠٢١

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Shalsky-JD00148

Exhibit 140

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Shatsky-JD00650-T

In the Name of Allah the Beneficent, the Merciful

PALESTINIAN LIBERATION ORGANIZATION

[PLO emblem]

PALESTINIAN LIBERATION ORGANIZATION

M'S F. & I. C. E.

Martyrs' Families and Injured Care Establishment

The Establishment / Nablus

The Brother, Deputy Assistant [of the Director General] of the Establishment, May Allah Protect him

Greetings of the homeland and the state...

Case name: Zaynab Ali Isa Abu Salem

Its type: Aqsa Martyr

Central number: 104750

Allowance: Redacted shekels

Required action and reasoning: ** Continue the disbursement because the martyr was single and the beneficiary is her mother. She is the sole beneficiary. She brought the Loss of Life [Certificate] and therefore I recommend to continue the disbursement. For your attention.

Attached documents: Loss of Life [Certificate]

Name and signature of the department head: [illegible]

Director's recommendation: The recommendation is to be confirmed. Continue the disbursement for the benefit of the martyr's mother, as she [the martyr] was single and she [the mother] is the sole beneficiary and is still alive. In accordance with the regulations. To be followed.

Date: 10.27.2019

Signature: [signature]

Action of the director general: The recommendation is to be confirmed in accordance with the regulations.

Date: 11.4.2019

Signature: [signature]

Main procedures: _____

Name and signature of executor: _____

Audit procedures: _____

Name and signature: _____

Nablus – Tel/Fax: 09 2385550

Nablus – Tel/Fax: 09 2385550

Ramallah-Tel/Fax: 02-2986268

Ramallah-Tel/Fax: 02-2986268

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Shatsky-JD00650-T

Confidential

Shatsky-JD00659 -T

In the name of Allah, the Gracious, the Merciful

[English] Palestinian National Authority
Ministry of Social Affairs
M's F. & I. C. E

P.A.
emblem

[Arabic] Palestinian National Authority
Ministry of Social Affairs
Martyrs' Families and Injured Care Establishment

In the name of Allah, the Gracious, the Merciful

Social Report



Case: Martyr of Al-Aqsa Intifada

Name: Zaynab Ali Abu Salem

Local number: 1115[*]

Central number:

Governorate: Nablus

Date: 9.30.2004

Ramallah - Tel/Fax: 02-2986268

Confidential

Shatsky-JD00659-T

Confidential

Shatsky-JD00660-T

Part 1: Personal Information

Local no.:	Central no.:
The case's name: Zaynab Ali Abu Salem	Code name:
Nationality: Palestinian	Identification no.: Redacted 4687
Beneficiary's full name: redacted (Wife, father, mother, brother, sister)	Identification no.: redacted
Mother's full name: Sahar Yousuf Abd A-Rahman Abu Salem	Mother's Identification no.: Redacted 8803
Wife's name: /	Wife's Identification no.: /
Place and date of birth: Redacted 1987 – Nablus	Place of origin: Jaffa
Religion: Muslim	Sex: Female Marital status: Single
Previous job: Student	Current job: -
Education: High school	
Date and number of confirmation letter:	
Date of confirmation in the institution:	

Part 2: Administrative Information

Military rank: First Sergeant		Organizational rank:	
Rank confirmation letter:		No.:	Date:
Developments in previous allowance:		Current: redacted	Changes: redacted
Organizational affiliation: Fatah / Al-Aqsa Martyrs Brigades		Sector:	
Date of joining the revolution:	Organizationally:	Militarily:	As a full-time member:
Training courses undertaken:			
Place and date of the incident: 9.22.2004 – Western Jerusalem / French Hill			
Details of the incident: She became a martyr during the perpetration of a martyrdom operation in the French Hill / Jerusalem, which claimed the lives of several soldiers and severely injured several people in the enemy ranks.			
Brief Biography: The hero martyr was born in 1987. She is originally from the occupied city of Jaffa. She grew up in Askar Camp in Nablus and studied in the UNRWA schools until she graduated from junior high school. She then studied in a high school in Nablus and graduated successfully two months before her martyrdom. She believed in the Al-Aqsa Intifada and thought it was the way to achieve freedom. Her combative activity was kept secret until she became a martyr for the sake of Jerusalem.			
The family's residence: Possessed: Agency [probably refers to UNRWA] unit		Rented:	Shared:
Monthly rent:	Redacted		
Full address:			
Nearest telephone:			

The house

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[cut off]: Family table: * married - single

1. If married, the names of the wives and minor children are written first, followed by the names of adult children, and then the names of the parents and siblings.
2. If single, the names of the parents are written first, followed by the names of minor siblings, and then adult siblings.

Serial no.	Name	Relationship to the case	DoB	Education	Profession	Marital status	Address
1	Redacted	Her father	Redacted	Junior high school	Photographer	Married	Redacted
2	Sahar Yousuf Abd A-Rahman Abu Salem	Her mother	1965	Elementary school	Housewife	Married	Nablu - [illegible]
3	Redacted	Sister	Redacted	Institute diploma	Housewife	Married	Redacted
4		Sister		3 year [illegible]	University student	Single	
5		Sister		High school	Housewife	Married	
6		Brother		10 th	Student	Single	
7		Sister		8 th	Student	Single	
8		Sister		7 th	Student	Single	
9		Brother		6 th	Student	Child	
10		Sister		5 th	Student	Child	
11		Sister		2 nd	Student	Child	
12							
13							
14							
15							
16							
17							
18							
19							
20							
21							
Number of dependents:							
If married: the wives and minor children:							
If single: the parents and the minor siblings:							
Notes concerning the family table:				Redacted			
Beneficiary's account number: Ali Isa Sa'ad Abu Salem							
Beneficiary's account number: Ali Isa Sa'ad Abu Salem							

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[cut off] of the case and its type: Zaynab Ali Isa Abu Salem, martyr of Aqsa

Recommendation of the Department:

* The martyr was born in 1987. Single. Her parents are alive. She has seven minor siblings.

* She became a martyr on 9.22.2004 when she executed her heroic martyrdom operation in French Hill. Several people from among the enemy ranks have died and several have been injured as a result of the operation.

* I recommend that she will be confirmed as a martyr of the Al-Aqsa Intifada.

_____ Date: 9.30.2004 Signature: [handwritten signature]

Decision of the establishment's director: (Nablus)

The martyr is single. She became a martyr after she blew her self up in Jerusalem on 9.22.2004.

She is confirmed as a martyr of the Al-Aqsa Intifada.

_____ Date 10.30.2004 Signature: [handwritten]

Calculation of the allowance:

<u>Basic</u>	<u>Wife</u>	<u>Children</u>	<u>Father</u>	<u>Mother</u>	<u>Minor siblings</u>	<u>Total in Dinar</u>

Other increments: _____

Total in dinar: _____

Total in shekels: _____

Confirmation of the director general:

[Illegible]

Audit's notes:

Date:

Signature [handwritten signature]

Computerized notes:

Date:

Signature:

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Shatsky-JD00663-T

RX Date/Time 12.04.2007 05:29

P.0001

08.12.2012 23:45

#2071 P. 001

In the Name of Allah the Beneficent, the Merciful

PALESTINIAN LIBERATION ORGANIZATION

In the name of Allah, the
Merciful, the
Compassionate

PALESTINIAN LIBERATION ORGANIZATION

M'S F. & I. C. E.

[PLO emblem]

Martyrs' Families and Injured Care Establishment

The Establishment / Nablus**The Brother, Director General of the Establishment, May Allah Protect him****Greetings of the homeland and the state...**Case name: Zaynab Ali Isa Abu SalemIts type: MartyrCentral number: 14750Allowance: Redacted shekels

Required action and reasoning: ** Close the file and transfer the allowance to the mother. The martyr was single and the allowance was equally divided between the mother and the father because there were family disputes at the time. The martyr's father has since died on 7.30.2012 and therefore the martyr's file is to be closed and the allowance is to be added to the file of the martyr's mother (Central 15552).

Attached documents: _____

Name and signature of the department head: Marwan Al-Qais[*] [signature]

Director's recommendation: The recommendation is to be confirmed. The allowance is to be fully transferred to the benefit of the martyr's mother, because the allowance was equally divided between the two parents (because the martyr was single) and the martyr's father has since died. Per regulations, the allowance should fully remain and disbursed for the benefit of the mother.

Date: 8.14.2012Signature: [signature]

Action of the director general: The father's allowance should stop, and the disbursement should be transferred fully to martyr's mother as of 8.1.2012.

Date: 8.14.2012Signature: [signature]

Main procedures: _____

Name and signature of executor: _____

Audit procedures: _____

Name and signature: _____

Nablus – Tel/Fax: 09 2385550

Nablus – Tel/Fax: 09 2385550

Ramallah-Tel/Fax: 02-2986268

Ramallah-Tel/Fax: 02-2986268

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Original

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Shatsky-JD00650

بسم الله الرحمن الرحيم

منظمة التحرير الفلسطينية

PALESTINIAN LIBERATION ORGANIZATION

M's F. & L.C.E.

مؤسسة رعاية أسر الشهداء والجرحى



المؤسسة / نابلس


الأخ الوكيل المساعد للمؤسسة / حفظه الله
نحية الوطن والدولة

اسم الحالة: زينب علي عيسى ابو سالم نوعها: شهيد قصي

الرقم المركزي: 104750 المخصص: Redacted شيك


الاجراء المطلوب والاسباب: ** استمرار الصرف حيث ان الشهيد عزباء والمستفيدة هي والدتها المستفيدة الوحيدة . وقد
احضرت تفقد حياه وعليه اوصي باستمرار الصرف لاجراء انكم .

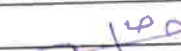
الوثائق المرفقة: تفقد حياه

اسم وتوقيع رئيس القسم: 

رأي المدير:

**** تعتمد التوصية ويستمر الصرف لصالح والدة الشهيد كونه اعزباء وهي المستفيدة الوحيدة وما زالت على قيد الحياه
وذلت حسب النظام مع المتابعه .

التاريخ: ٢٠١٩-١٠-٢٩ التوقيع: 

اجراء المدير العام : التاريخ: ٢٠١٩/١١/٤ التوقيع: 

الاجراء المركزي: اسم وتوقيع المنفذ:

اجراء التدقيق: الاسم والتوقيع:

Nablus - Tel/Fax : 09 2385550
Ramallah-Tel/Fax : 02-2986268

نابلس - تلفاكس : 09 - 2385550
رام الله - تلفاكس : 02 - 2986268

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Shatsky-JD00659

Palestinian National Authority
Ministry of Social Affairs
M's F. & I. C. E.



السلطة الوطنية الفلسطينية
وزارة الشؤون الاجتماعية
مؤسسة رعاية أسر الشهداء والجرحى

بسم الله الرحمن الرحيم



بحث اجتماعي

الحالة : سيدة شاعرة الرفعة

الاسم : زينب علي عبد السلام

الرقم المحلي : ١١ ١٥ الرقم المركزي :

المحافظة : البحر

التاريخ : ٢٠٢٠ / ٩ / ٢٠

Ramallah - Tel/ Fax : 02-2986268

رام الله - تليفاكس : ٠٢-٢٩٨٦٢٦٨

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Shatsky-JD00661

ثانياً : الجدول الأسري : * متزوج - أعزب

١ - المتزوج : سجل الزوجات والأبناء القصر أولاً ثم الأبناء فوق سن الانجاب ثم الوالدين والأخوة
 ٢ - الأعزب : سجل الوالدين والأخوة القصر أولاً ثم الأخوة فوق سن الانجاب *

الاسم	العلاقة بالحالة	تاريخ الميلاد	المؤهل العلمي	المهنة	الحالة الاجتماعية	العنوان
Redacted	Redacted	Redacted	Redacted	Redacted	Redacted	Redacted
١	والدها	Redacted	إداري	مصور	متزوج	Redacted
٢	والدها	١٩٦٥	أبنة	ربحية	متزوجة	Redacted
٣	Redacted	Redacted	دبلوم	ربحية	متزوجة	Redacted
٤	Redacted	Redacted	شهادة أدي	طالبة جامعية	عزباء	Redacted
٥	Redacted	Redacted	تاريخ عام	ربحية	متزوجة	Redacted
٦	Redacted	Redacted	عاشق	طالبة	أعزب	Redacted
٧	Redacted	Redacted	تامة	طالبة	عزباء	Redacted
٨	Redacted	Redacted	سابع	أ	أ	Redacted
٩	Redacted	Redacted	سادي	طالبة	أعزب	Redacted
١٠	Redacted	Redacted	فاسي	طالبة	أعزب	Redacted
١١	Redacted	Redacted	تاني	طالبة	أ	Redacted
١٢						
١٣						
١٤						
١٥						
١٦						
١٧						
١٨						
١٩						
٢٠						
٢١						

عدد المعالين :

- المتزوج : الزوجات والأبناء القصر *

- الأعزب : الوالدين والأخوة القصر *

ملاحظات على الجدول الأسري :

رغم صياغة المستمير ١ على غير رسمه اوسلم - ٢
 على رسمه اوسلم

Redacted

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وصية القبط
 ١. السيد ...
 ٢. السيد ...
 ٣. السيد ...
 ٤. السيد ...
 ٥. السيد ...
 التاريخ : ١٩١٢
 التوقيع : ...

قرار مدير المؤسسة : (١٠١٤)
 السيد / أحمد محمد
 السيد / أحمد محمد
 التاريخ : ١٠/١٤
 التوقيع : أحمد محمد

حساب المخصص :

اسمائي زوجتي اولاد اب ام اخوة قصر المجموع بالدينار

علاوات أخرى :

المجموع: ١٠٠٠ دينار

المستوعب والمفكر

اعتماد المدير العام

ملاحظات التدقيق: _____
التاريخ: _____

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RX Date/Time
12/08 2012 23 45

04/12/2007 05:29

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P.001
#2071 P 001

بسم الله الرحمن الرحيم

PALESTINIAN LIBERATION ORGANIZATION



منظمة التحرير الفلسطينية

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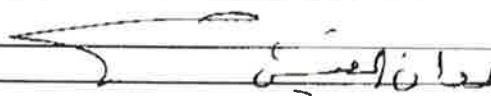
مؤسسة رعاية أسر الشهداء والجرحى

المؤسسة / نابلس

الأخ مدير عام المؤسسة / حفظه الله

تحية الوطن والدولة ،،،،،


اسم الحالة: زينب علي عيسى ابو سالم نوعها: شهيد
 الرقم المركزي: ١٤٧٥٠ المخصص: Redacted شئكل
 الاجراء المطلوب والاسباب: ** اغلاق الملف وتحويل الحصة للوالده ، الشهيد عزباء وكان المخصص مقسوم بالتساوي
 بين الوالده والوالد بسبب حصول خلافات عائلته في حينه وقد توفي والد الشهيد بتاريخ ٢٠١٢/٧/٣٠ لذا يغلغ ملف الشهيد
 وتضاف الحصة الي ملف والده الشهيد (مركزي ١٥٥٥٢) .

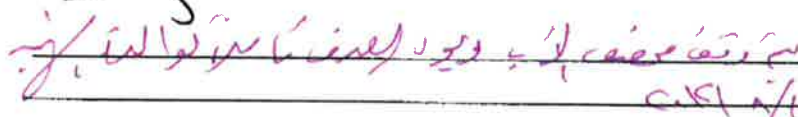
الوثائق المرفقة:
 اسم وتوقيع رئيس القسم: 


رأي المدير:

*** تعتمد التوصية ويحول المخصص كامل لصالح والده الشهيد حيث كان المخصص مقسوم بين الوالدين (لان الشهيد

عزباء) وتوفي الوالد وعليه حسب النظام يبقى المخصص كاملا ويصرف لصالح الوالده .

التاريخ: ٢٠١٢/٨/١٤ توقيع مدير المؤسسة: 

اجراء المدير العام: 
 التاريخ: ٢٠١٢/٨/١٤

التاريخ: ٢٠١٢/٨/١٤ التوقيع: 

الاجراء المركزي: اسم وتوقيع المنفذ:

اجراء التدقيق: الاسم والتوقيع:

Nablus - Tel/Fax : 09 2385550
 Ramallah-Tel/Fax : 02-2986268

نابلس - تلفاكس : ٠٩ - ٢٣٨٥٥٥٠
 رام الله - تلفاكس : ٠٢ - ٢٩٨٦٢٦٨

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Exhibit 141

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Personal Information:ID Card: ^{Redacted} 4687

Four-Part Name: Zaynab Ali Isa Abu Salem Type of Document: Palestinian ID

Date of Birth: ^{Redacted} /1987

Ministry: Nabhus

Gender: Female

Categories:

<u>Scale</u>	<u>Level</u>	<u>Group</u>	<u>Start Date</u>	<u>End Date</u>
New Scale for the Families of Martyrs	Unspecified	Unspecified	Redacted	

Increments and Deductions:

<u>Code</u>	<u>Start Date</u>	<u>End Date</u>	<u>Value</u>	<u>Percentage or amount</u>	<u>Reference</u>	<u>ID No.</u>	<u>Beneficiary Name</u>
			Redacted				

Case Data:

<u>Case Type</u>	<u>Start Date</u>	<u>End Date</u>	<u>Disability Percentage</u>	<u>Disability Type</u>	<u>Decision Type</u>
Martyr	Redacted		0	Unspecified	

Beneficiaries' Data:

<u>ID No.</u>	<u>Name</u>	<u>Start Date</u>	<u>End Date</u>	<u>Percentage / Value</u>	<u>Percentage</u>	<u>Number of Wives</u>	<u>2nd Wife</u>	<u>Number of Children</u>	<u>Nature of Apportionment</u>	<u>Central No.</u>
Redacted										
Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	Redacted		Percentage	100	0	0	0	Apportionment of the military rank	Redacted

<u>ID No.</u>	<u>Name</u>	<u>Start Date</u>	<u>End Date</u>	<u>Bank</u>	<u>Branch</u>	<u>Account No.</u>	<u>Central No.</u>
Redacted							
Redacted 8803	Sahar Yousuf Abd A-Rahman Ab[cut off]	Redacted				Redacted	

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Shatsky-JD00209-T

Print Date: 05/31/2021

Discontinuation Data:

Discontinuation Data:			
<u>Reason for Discontinuation</u>	<u>Start Date</u>	<u>End Date</u>	<u>Reason for resumption</u>
	Redacted		
Last credit	03/01/2021	03/01/2021	Information completed
	Redacted		
Information completed	02/01/2022		

Stipend Data at Bank:

Stipend Data at Bank:			
Month	ID No.	Name	Stipend
<u>Redacted</u>			

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Shatsky-JD00210-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Month	ID No.	Name	Stipend
Redacted			

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Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Month	ID No.	Name	Stipend
Redacted			

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Shatsky-JD00212-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

Month	ID No.	Name	Stipend
Redacted			
04/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
05/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
06/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
07/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
08/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
09/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
10/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
11/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
12/1/2020	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
01/1/2021	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
02/1/2021	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400
03/1/2021	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400

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Shatsky-JD00213-T

Palestinian National Authority

[Emblem of the Palestinian National Authority]

Martyrs' Families and Injured Care Establishment

Print Date: 05/31/2021

<u>Month</u>	<u>ID No.</u>	<u>Name</u>	<u>Stipend</u>
04/1/2021	Redacted 8803	Sahar Yousuf Abd A-Rahman Abu Salem	1400

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Shatsky-JD00214-T

Original

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 ١١:٠٥ صباحاً

هوية فلسطينية	نوع الوثيقة	زينب علي عيسى ابومدلم	الاسم الرسمي	Redacted	Redacted	البيانات الشخصية
انثى	الجنس	فلسطين	الموادة	Redacted	Redacted	تاريخ الميلاد

الدرجات

الاسم	الدرجة	اللقبة	من تاريخ	الى تاريخ
سلم 'سر الشهداء الجديد	غير محددة	غير محددة	Redacted	

الاعلاوات والمصنفات

الرمز	من تاريخ	الى تاريخ	القيمة	نسبة او مبلغ	المرجع	رقم الهوية	اسم المستفيد
Redacted							

بيانات الحق

نوع الحالة	من تاريخ	الى تاريخ	نسبة الاعاقة	نوع الاعاقة	نوع القرار
شاهد	Redacted		0	غير محددة	

بيانات المستفيدين

رقم الهوية	الاسم	من تاريخ	الى تاريخ	نسبة/قيمة	قيمة التسمية	عدد زوجات	زوجة ثانية	عدد الاولاد	طبيعة القسمة	الرقم المركزي
Redacted	سحر يوسف عبد الرحمن ابوسالم	Redacted		تمية	100	0	0	0	قيمة المخصص	Redacted
رقم الهوية	الاسم	من تاريخ	الى تاريخ	البلد	الفرع	رقم الحساب	الرقم المركزي			
Redacted	سحر يوسف عبد الرحمن ابوسالم	Redacted		Redacted	Redacted	Redacted	Redacted			

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Shalsky-JD00209

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

تاريخ الطاعة 31/05/2021

بيانات توقف			
سبب الوقف	من تاريخ	الى تاريخ	سبب الإعادة
	Redacted		
نهاية الاعتماد	١٦/٠٣/٢٠٢١	١٦/٠٣/٢٠٢١	استكمال المعلومات
	Redacted		
استكمال المعلومات	١٦/٠٢/٢٠٢٣		

بيانات الراتب في البنك			
الشهر	رقم الشهادة	الاسم	الراتب
Redacted			

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Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 تاريخ الطابعة

الترتيب	الاسم	رقم الهوية	المهنة
Redacted			

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Shatsky-JD00211

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 تاريخ الطابعة

الترتيب	الاسم	رقم الهوية	الشهر
Redacted			

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Shatsky-JD00212

Palestinian National Authority



السلطة الوطنية الفلسطينية
مؤسسة رعاية أسر الشهداء والجرحى

31/05/2021 تاريخ الطابعة

الرتب	الاسم	رقم الهوية	التميز
Redacted			
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠١/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠٥/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠٦/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠٧/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠٨/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠٩/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/١٠/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/١١/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/١٢/٢٠٢٠
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠١/٢٠٢١
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠٢/٢٠٢١
١٤٠٠	سحر يوسف عبد الرحمن ابوسلم	Redacted ٨٨٠٣	١/٠٣/٢٠٢١

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Shatsky-JD00213

Palestinian National Authority

السلطة الوطنية الفلسطينية
مؤسسة رعاية اسر الشهداء والجرحى

31/05/2021 ٣١٠٥٠٠

الرتب	الاسم	رقم الهوية	الشهر
١٤٠٠	سحر يوسف عبد الرحمن ابو مسلم	Redacted ٨٨٠٣	١/٠٤/٢٠٢١

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Shatsky-JD00214

Exhibit 142

Abdel Jabbar Salem
July 27, 2021

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

SHABTAI SCOTT SHATSKY,)	Case No. 18-Civ. 12355
individually and as)	
personal representative)	
of the Estate of Keren)	VIRTUAL VIDEOTAPED
Shatsky, J ANNE)	DEPOSITION OF ABDEL
SHATSKY, individually)	JABBAR SALEM
and as personal)	
representative of the)	
Estate of Keren)	
Shatsky, TZIPPORA)	
SHATSKY SCHWARZ, YOSEPH)	
SHATSKY, SARA SHATSKY)	
TZIMMERMAN, MIRIAM)	
SHATSKY, DAVID RAPHAEL)	
SHATSKY, GINETTE LANDO)	
THALER, individually)	
and as personal)	
representative of the)	
Estate of Rachel)	
Thaler, LEOR THALER,)	
ZVI THALER, ISAAC)	
THALER, HILLEL)	
TRATTNER, RONIT)	
TRATTNER, ARON S.)	
TRATTNER, SHELLEY)	
TRATTNER, EFRAT)	
TRATTNER, HADASSA)	
DINER, Yael HILLMAN,)	
STEVEN BRAUN, CHANA)	
FRIEDMAN, ILAN)	
FRIEDMAN, MIRIAM)	
FRIEDMAN, YEHIEL)	
FRIEDMAN, ZVI FRIEDMAN,)	
and BELLA FRIEDMAN,)	

Plaintiffs,

against

Abdel Jabbar Salem
July 27, 2021

1
2 THE PALESTINE
3 LIBERATION ORGANIZATION
4 and THE PALESTINIAN
5 AUTHORITY (a/k/a "The
6 Palestinian Interim
7 Self-Government
8 Authority" and/or "The
9 Palestinian National
10 Authority"),

11
12 Defendants.

Abdel Jabbar Salem
July 27, 2021

1 VIRTUAL VIDEOTAPED DEPOSITION OF ABDEL
2 JABBAR SALEM, witness herein, called by the
3 Plaintiffs, for examination, taken pursuant to
4 the Federal Rules of Civil Procedure, by and
5 before Karen A. Nickel, a Certified Realtime
6 Reporter and a notary public in and for the
7 Commonwealth of Pennsylvania, held remotely
8 with all parties appearing from their
9 respective locations, on Tuesday, July 27,
10 2021, at 7:30 a.m.
11 COUNSEL PRESENT:
12
13 For the Plaintiffs:
14 Melissa H. Maxman, Esq.
15 Ronald F. Wick, Esq. (Admitted Pro Hac Vice)
16 Cohen & Gresser, LLP
17 2001 Pennsylvania Avenue, NW
18 Suite 300
19 Washington, DC 20006
20
21 Stephen M. Sinaiko, Esq.
22 Cohen & Gresser, LLP
23 800 Third Avenue
24 New York, NY 10022
25
26 For the Defendants:
27 Mitchell R. Berger, Esq.
28 Joseph Alonzo, Esq.
29 Squire Patton Boggs
30 2550 M Street NW
31 Washington, DC 20037
32
33 Also Present: Elizabeth Bezverkha
34 Eszter Vincze
35 Corey Wainaina, Videographer
36 Hadeer Al Amiri, Interpreter
37 Safwan Al-Amin, Check
38 Interpreter

Abdel Jabbar Salem
July 27, 2021

I N D E X

WITNESS	PAGE
Abdel Jabbar Salem	
By Ms. Maxman	6

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Exhibit 3	E-mail	37
Exhibit 4	Payment Records	51
Exhibit 5	Combined Exhibits	58

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P R O C E E D I N G S

VIDEOGRAPHER: Good morning,
everyone. We are now on the record.
Participants should be aware that this
proceeding is being recorded and, as such, all
conversations held will be recorded unless
there is a request and agreement to go off the
record.

This is the remote video-recorded
deposition of Abdel Jabbar Salem. Today is
Tuesday, July 27, 2021. The time is now 11:22
UTC time. We are here in the matter of Shatsky
versus PLO.

My name is Corey Wainaina, remote
video technician on behalf of US Legal Support
located at 90 Broad Street, New York, New York.
I am not related to any party in this action,
nor am I financially interested in the outcome.

At this time, will the reporter,
Karen Nickel, on behalf of US Legal Support,
please enter the statement for remote
proceedings into the record.

THE REPORTER: The attorneys
participating in this deposition acknowledge
that I am not physically present in the

Abdel Jabbar Salem
July 27, 2021

1 deposition room and that I will be reporting
2 this deposition remotely.

3 They further acknowledge that, in
4 lieu of an oath administered in person, the
5 witness will verbally declare his testimony in
6 this matter is under penalty of perjury.

7 The parties and their counsel
8 consent to this arrangement and waive any
9 objections to this manner of reporting. Please
10 indicate your agreement by stating your name
11 and your agreement on the record.

12 MS. MAXMAN: Melissa Maxman, I
13 agree.

14 MR. BERGER: This is Mitchell
15 Berger on behalf of the Defendants, and I
16 agree.

17 (The interpreter was duly
18 sworn.)

19 ABDEL JABBAR SALEM, a witness herein,
20 having been first duly sworn, was examined and
21 testified as follows:

22 EXAMINATION

23 BY MS. MAXMAN:

24 Q. Good morning, or good afternoon. I
25 don't know what time it is where you are.

1 Thank you for being here today. My
2 name is Melissa Maxman. I'm a partner at Cohen
3 & Gresser, and we represent the Plaintiffs in
4 this matter.

5 Could you please state your name and
6 address for the record.

7 A. Good afternoon. My name is Abdel
8 Jabbar Mohammad Salem.

9 Q. And your address?

10 A. My address is [REDACTED].

11 Q. And how do you spell your name, sir?

12 A. How do I spell my name?

13 Q. Yes.

14 A. A-B-D-E-L, J-A-B-B-A-R, S-A-L-E-M.

15 Q. Thank you. What is your occupation
16 and title?

17 A. I work at -- I work in the financial
18 ministry. I work as director of the salary and
19 financial in the Palestinian government in
20 Ramallah.

21 Q. Director of salary and financial,
22 did I hear that correctly?

23 A. The director of the salary, the
24 wages.

25 Q. Okay. Thank you. Have you ever had

1 your deposition taken before?

2 A. No.

3 Q. I'm going to be asking you questions
4 throughout today and tomorrow, and I would like
5 to go over some ground rules first so that you
6 understand the process.

7 A. Yes, ma'am.

8 Q. Do you understand that you are
9 testifying here today under oath?

10 A. Yes, correct.

11 Q. And the court reporter will be
12 transcribing everything we say. So to make
13 sure that the record is accurate, and
14 especially since this deposition is taking
15 place via video remotely because of the COVID
16 pandemic, it's important that we not speak over
17 each other and that only one person speaks at a
18 time.

19 So please wait until I finish my
20 question before you start answering, and I will
21 wait -- I will try to wait until you finish
22 your answer before I ask another question.

23 Is that understood?

24 A. (Witness nodded head affirmatively.)

25 Q. I couldn't hear you, I'm sorry. I

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1 think it's the audio. He said yes?

2 A. Yes.

3 Q. Thank you. It is also important for
4 you to respond to the questions verbally
5 because, otherwise, the court reporter cannot
6 transcribe what you said. She cannot
7 transcribe a head nod, yes or no. Is that
8 understood?

9 A. Understood.

10 Q. Thank you. If you don't understand
11 one of my questions, please say so. I will try
12 to rephrase it for you if you don't understand
13 it. But if you answer my question, I will
14 assume you understood my question; is that
15 understood?

16 A. Understood.

17 Q. Your counsel may object to my
18 questions. Unless your counsel instructs you
19 not to answer a question, you should go ahead
20 and answer the question even though there is an
21 objection pending.

22 Do you understand that?

23 A. Understood.

24 Q. I may take periodic breaks during
25 the deposition. If you need a break, please

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1 let me know, me or your attorney know, and I
2 will do my best to accommodate your request.

3 However, if a question is pending, I
4 ask that you answer the question first before
5 we take a break. All right?

6 A. Thank you.

7 MS. MAXMAN: Because we are
8 here remotely during the pandemic, we would ask
9 that the Defendants confirm that pursuant to
10 Rule 30(b)(4) of the Federal Rules of Civil
11 Procedure, today's deposition may be taken by
12 video conference as we are proceeding, and,
13 pursuant to Rule 29, parties also stipulate
14 that Ms. Nickel is an appropriate officer
15 before whom this deposition may be taken even
16 though she is in Pennsylvania and the witness
17 is physically located in Jordan.

18 Do we agree, Mr. Berger?

19 MR. BERGER: Yes, we do agree.

20 MS. MAXMAN: Thank you.

21 BY MS. MAXMAN:

22 Q. Is there any reason that you can
23 think of that you will not be able to answer my
24 questions today fully and accurately and
25 truthfully?

1 A. No, there isn't.

2 Q. Just so you understand, we are going
3 to be referring to the Defendants today as --
4 the Palestinian Authority, I'm going to refer
5 to as PA, and I will be referring to the
6 Palestinian Liberation Organization as PLO.

7 Do you understand that?

8 A. Yes.

9 Q. I'm going to start with your
10 personal background, with your educational
11 background. What is your highest level of
12 education?

13 A. I have a Bachelor degree in
14 accounting from An-Najah University.

15 Q. Could you spell the name of your
16 University?

17 A. I'm not that good in English.

18 Q. Okay. You testified that you are
19 the collector of salary wages. Before your
20 position with -- let me back up.

21 Who is your employer today?

22 A. Not the director, the director of --
23 yes.

24 Q. Okay. Thank you. I misheard.

25 Thank you.

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1 Who is your employer today?

2 A. My director is the Minister of
3 Finance.

4 Q. That is the person to whom you
5 report?

6 A. Correct.

7 Q. Yes?

8 MR. BERGER: Counsel, I think
9 we understood your question. I think the
10 translation was who is your boss rather than
11 for what organization do you work.

12 MS. MAXMAN: Okay. Thank you.

13 BY MS. MAXMAN:

14 Q. For what organization do you work
15 currently?

16 A. The Ministry of Finance.

17 Q. The Ministry of Finance of what
18 organization?

19 A. The Palestinian Authority.

20 Q. Okay. And when you said you worked
21 for -- your boss was the Minister of Finance,
22 who is that person?

23 A. Shukri Bishara.

24 Q. Aside from director of salary, do
25 you have any other titles with the Palestinian

Abdel Jabbar Salem
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1 Authority?

2 A. No.

3 Q. Do you hold any other titles within
4 the PLO?

5 A. No.

6 Q. And this Shukri Bishara -- forgive
7 me if I'm not pronouncing his name correctly --
8 is -- give me a second.

9 Your boss, does he hold any
10 positions with the PLO?

11 A. No. Only the Minister of Finance.

12 Q. For the Palestinian Authority?

13 A. Yes.

14 Q. And who appointed the Minister of
15 Finance?

16 A. I assume the Prime Minister.

17 Q. The Prime Minister of the
18 Palestinian Authority?

19 A. Yes, correct.

20 Q. How long have you held your current
21 position?

22 A. Ten years.

23 Q. Have you had other positions within
24 the PA?

25 A. Before ten years, I was working in

Abdel Jabbar Salem
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1 the treasury in the same position, the finance
2 and the Ministry of Finance, and the payment
3 department.

4 Q. And before that -- well, how long
5 were you in that position?

6 A. From 1995 up until 2010.

7 Q. And before 1995, what was your --
8 what was your employment?

9 A. I was not working anywhere. I was
10 just graduating from college. And then I
11 joined the Ministry of Finance.

12 Q. Okay. So since college, you have
13 been employed by the Palestinian Authority --
14 I'm sorry, let me rephrase that.

15 Since 1995 when you graduated from
16 college, your only employer has been the
17 Palestinian Authority?

18 A. Correct.

19 Q. What are your current
20 responsibilities as director of salary for the
21 ministry of finance?

22 A. I work as the general director of
23 the salaries, of the wages, in the Ministry of
24 Finance. This includes preparing, collecting
25 and, up until the distribution of the salaries

Abdel Jabbar Salem
July 27, 2021

1 in the Palestinian Authority.

2 Q. And are you the director of the
3 salaries for everyone who works for the
4 Palestinian Authority?

5 A. Yes, correct.

6 Q. How many people work for the
7 Palestinian Authority?

8 A. It ranges from employees and semi
9 employees around 120,000 workers.

10 Q. What do you mean by "semi
11 employees"?

12 MR. BERGER: I am going to
13 object to the question as being outside the
14 scope of this jurisdictional discovery
15 deposition. We have been trying to give you
16 some leeway on background, but the Judge's
17 admonition is to stick to the predicates of the
18 jurisdictional statute.

19 You may answer, but we're going to
20 see how this goes.

21 THE WITNESS: When I say semi
22 employment, I mean, this means some people who
23 work as a contract or temporary, that work for
24 a period of time.

25 BY MS. MAXMAN:

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1 Q. Do you also oversee payments to
2 prisoners?

3 A. I am responsible for overseeing the
4 distribution of the payment. The collection
5 and these responsibilities are in the prison
6 affairs.

7 Q. What are you collecting?

8 A. Like, what do you mean by that?

9 Q. You said -- I believe you said, I am
10 responsible for overseeing the distribution of
11 the payments and the collection. And you said,
12 and these responsibilities are in the prison
13 affairs.

14 And my question is, what do you mean
15 by "collection"?

16 A. I oversee the information, examine
17 the information that I receive from the
18 prisoners' affairs, because these are not
19 salaries. These are incentives that are given.

20 So I examine them and oversee them.
21 And then it gets distributed.

22 MR. BERGER: Excuse me. We
23 object to the translation. He did not use the
24 word "incentives" in his comment. "Allocation"
25 would be the correct translation.

1 MS. MAXMAN: Mr. Berger, are
2 you using a check translator on your end?

3 MR. BERGER: I have an Arabic-
4 proficient associate listening to the
5 translation. He is serving as our check
6 translator.

7 BY MS. MAXMAN:

8 Q. Okay. So you're saying -- let me
9 ask the question again because I am now
10 completely confused.

11 My question is, what do you mean by
12 "collection"?

13 A. By "collection," I mean the
14 information that we get as a CD, and we examine
15 them -- examine the allocations and the
16 department IT before handling it to prisoners'
17 affairs to avoid inequality.

18 Q. You mean you get it on a compact
19 disk, a CD?

20 MR. BERGER: We object to the
21 translation. The witness did not use the word
22 "inequality." He used the word "double
23 counting."

24 INTERPRETER: Sorry. This is
25 the interpreter. This is "alaizdiwajia," which

Abdel Jabbar Salem
July 27, 2021

1 is not double counting.

2 MR. BERGER: Duplication is
3 our translation.

4 MS. MAXMAN: Can we go off the
5 record for a minute, please?

6 MR. BERGER: Certainly.

7 THE VIDEOGRAPHER: We are now
8 off the record. The time is 11:50 UTC time.

9 (Discussion held off the
10 record.)

11 THE VIDEOGRAPHER: We are
12 back on the record. The time is 11:53 UTC
13 time.

14 MS. MAXMAN: Mr. Berger, can
15 you please identify the associate that is with
16 you that is serving as your check translator?

17 MR. BERGER: Yes, I did that
18 off the record.

19 MS. MAXMAN: We can't hear
20 you, sir.

21 MR. BERGER: Can you hear me
22 now?

23 MS. MAXMAN: Yes.

24 MR. BERGER: I did that with
25 the court reporter while you were off the

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1 record. His first name is Safwan, S-A-F-W-A-N,
2 last name Al-Amin, A-L, dash, A-M-I-N.

3 MS. MAXMAN: Okay. Thank you.

4 MR. BERGER: While we are
5 talking about check translation, and maybe this
6 will save you some time, but let me put it on
7 the record, which is that our translation of
8 the word you are asking about, "collection,"
9 was, in fact, more properly translated as
10 "preparation."

11 MS. MAXMAN: Okay. We will
12 leave that for a moment and come back to it.

13 BY MS. MAXMAN:

14 Q. Mr. Salem, you realize you have been
15 designated as the 30(b)(6) deponent about the
16 Palestinian Authority and the PLO today; do you
17 understand that?

18 INTERPRETER: I'm sorry, this
19 is the interpreter. Can you repeat the
20 question?

21 MS. MAXMAN: Sure.

22 BY MS. MAXMAN:

23 Q. Are you aware that you have been
24 designated as the corporate witness for both
25 the PA and the PLO today?

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1 A. Yes, I know that.

2 MS. MAXMAN: Can we please put
3 up Tab 1 which, court reporter, I will be
4 entering as Exhibit 1 for the record. It is
5 the 30(b)(6) deposition notice that is dated
6 June 16, 2021, and I will ask that we scroll
7 through the exhibit.

8 (Deposition Exhibit No. 1 was
9 marked for identification.)

10 BY MS. MAXMAN:

11 Q. And my question for the witness is,
12 have you seen this document before?

13 A. Yes.

14 Q. And what -- when did you first see
15 it?

16 A. When I met with the attorneys.

17 Q. When was that?

18 A. Approximately, a month ago.

19 Q. And you are appearing today as a
20 witness pursuant to this notice; correct?

21 A. Correct.

22 Q. Who designated you, who decided that
23 you would be the designee to testify on behalf
24 of the Palestinian Authority?

25 A. I received this from the Minister of

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1 A. Yes, correct.

2 Q. Does the PA make the payments to the
3 prisoners?

4 MR. BERGER: Object to the
5 form of the question. Assumes facts not in
6 evidence.

7 BY MS. MAXMAN:

8 Q. You may answer.

9 A. I didn't understand your question.

10 Q. Okay. Does the PA make the payments
11 to the prisoners?

12 MR. BERGER: Same objection to
13 form. You may answer.

14 THE WITNESS: The PA pays the
15 allocations for the families and the members of
16 the prisoners, and the PA make the payments,
17 all the payments, and part of these payments
18 goes towards the families of the prisoners.

19 BY MS. MAXMAN:

20 Q. Where does the PA obtain the funds
21 to make these payments?

22 A. It's the income that the PA receives
23 from the taxes, from the customs, from the
24 merchants, from the revenues.

25 MS. MAXMAN: I would like to

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July 27, 2021

1 documents.

2 Q. And am I correct that these are
3 payment records for prisoners, that this is a
4 -- that this page, and all of the pages are
5 records of payments to prisoners?

6 MR. BERGER: Before he
7 answers, I'm going to object to the form of the
8 question, but you may answer.

9 THE WITNESS: Yes. This is
10 allocation payments for this specific prisoner.
11 BY MS. MAXMAN:

12 Q. And in this case, the specific
13 prisoner is Mohammed Attia Mahmoud Abu Wardeh?

14 MR. BERGER: We have an
15 objection to the antecedent translation. I
16 believe he said to the families of the
17 prisoners. That is our translation. Ask the
18 translator if he missed that.

19 INTERPRETER: I'm sorry, can
20 you repeat that?

21 MR. BERGER: He mentioned,
22 according to our translation, families of
23 prisoners, which you omitted from your
24 translation. We object to the translation on
25 that basis.

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July 27, 2021

1 INTERPRETER: Okay. So it's
2 the payment for families of the prisoners.

3 BY MS. MAXMAN:

4 Q. And in the case of the page we are
5 looking at, these would be payments to the
6 families of Mr. Abu Wardeh?

7 A. Yes, correct.

8 MS. MAXMAN: Do you have
9 before you in paper, and, Mr. Berger, I can ask
10 you this, does he have before him in paper all
11 of the Bates numbers I mentioned from JD 250 to
12 JD 534?

13 MR. BERGER: We have them
14 accessible, yes.

15 MS. MAXMAN: Okay, great. I'm
16 going to be asking general questions about the
17 nature of these documents, and so I was just
18 trying to find a -- I was trying to find a page
19 that actually had writing on it rather than
20 just redactions.

21 BY MS. MAXMAN:

22 Q. Am I correct, Mr. Salem, that these
23 records of payments are kept in the normal
24 course of business by the Palestinian
25 Authority?

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1 A. Yes, of course. It is kept in the
2 Ministry of Finance after making the payment on
3 the monthly basis.

4 Q. And are they also kept in the normal
5 course of business by the PLO?

6 A. These documents are prepared for in
7 the prisoners' affairs and it's sent to the
8 Ministry of Finance and kept in the Ministry of
9 Finance stored on a CD.

10 Q. Is the prisoners' affairs department
11 part of the Palestinian Authority?

12 A. I think so.

13 Q. What is the Commission For Prisoners
14 and Ex-Prisoners?

15 MR. BERGER: Excuse me,
16 counsel. We understand your question but don't
17 believe the translation was of the question you
18 asked, which is what is the Commission For
19 Prisoners and Ex-Prisoners.

20 MS. MAXMAN: That is the
21 question I asked.

22 MR. BERGER: If we want to
23 retranslate the question, what we heard from
24 the translation was the word "payments" was put
25 into the translation.

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1 INTERPRETER: I'm sorry, this
2 is the interpreter. I didn't say commissions.

3 MR. BERGER: Right. I think
4 maybe there is a misunderstanding on the part
5 of the translator whether these are commission
6 payments -- look, we understand what you want
7 to know, counsel. We're happy to have him
8 answer it. You want to know what is the entity
9 within the Palestinian government called the
10 Commission of Prisoners and Ex-Prisoners. I'm
11 happy to have him answer that question.

12 MS. MAXMAN: Okay. Just to be
13 clear, I have it as the Commission For
14 Prisoners and Ex-Prisoners, but if it's the
15 Commission of Prisoners and Ex-Prisoners, I
16 would be happy to --

17 MR. BERGER: I am happy to
18 stand corrected.

19 INTERPRETER: Sorry, can you
20 repeat the question?

21 BY MS. MAXMAN:

22 Q. What is the Commission For Prisoners
23 and Ex-Prisoners?

24 INTERPRETER: This is
25 interpreter. When you say commission --

Abdel Jabbar Salem
July 27, 2021

1 THE WITNESS: It is the
2 prisoners' affairs department.

3 BY MS. MAXMAN:

4 Q. Okay. So that's the same prisoners'
5 affairs department that's part of the
6 Palestinian Authority that you have been
7 referring to earlier in this deposition?

8 A. The finance for it is part of the
9 general finance from the Palestinian Authority
10 and does the allocation for the prisoners.

11 Q. Let me clarify my question. You
12 have previously been -- strike that.
13 Previously, you mentioned the prisoners'
14 affairs department within the PA. Is that same
15 thing as the Commission For Prisoners and
16 Ex-Prisoners?

17 A. Correct.

18 Q. Thank you. So going forward, I am
19 going to refer to the Commission For Prisoners
20 and Ex-Prisoners as the prisoners' affairs
21 department. Can you --

22 A. It is its name, the name is the
23 Commission For The Prisoners and Ex-Prisoners.

24 Q. Okay. But for shorthand, I'm going
25 to call it the prisoners' affairs -- I'm going

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July 27, 2021

1 to call it prisoners' affairs.

2 A. Okay, prisoners' affairs.

3 Q. Does prisoners' affairs make
4 payments to certain prisoners and ex-prisoners?

5 A. Can you repeat the question? I
6 didn't understand it.

7 Q. What is -- strike that.

8 Does prisoners' affairs make
9 payments to certain prisoners and ex-prisoners?

10 A. No. It's prepared in the prisoners'
11 affairs, and it's distributed through the
12 Ministry of Finance.

13 Q. Okay. And that's your department?

14 A. In the general department that is
15 examined in the IT department, and it's
16 distributed at the end of the month.

17 Q. And it's distributed at the end of
18 the month by the Ministry of Finance?

19 A. Yes, correct.

20 MS. MAXMAN: I'm going to take
21 a five-minute break, just a comfort break, and
22 then we'll go to another topic.

23 MR. BERGER: Sounds good to
24 us. Thank you.

25 THE VIDEOGRAPHER: We are now

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1 off the record. The time is 12:34 UTC time.

2 (Discussion held off the
3 record.)

4 THE VIDEOGRAPHER: We are
5 back on the record. The time is 12:45 UTC
6 time.

7 BY MS. MAXMAN:

8 Q. As of April 18, 2020, who was the
9 head of the prisoners' affairs?

10 A. The PA.

11 Q. I mean who is the individual who
12 heads --

13 A. Qadri Abu Bakr.

14 Q. Does Mr. Bakr have any other titles
15 within the PA?

16 A. No. He is the head of the director
17 of the prisoners' affairs.

18 Q. Does he have any other titles within
19 the PLO?

20 A. I don't think so.

21 Q. Who decides the recipients -- strike
22 that.

23 Who decides what prisoners and
24 ex-prisoners are paid?

25 MR. BERGER: Objection.

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1 Counsel, can we have an agreement that your
2 question is as of and after April 18, 2020?

3 MS. MAXMAN: Yes.

4 THE WITNESS: It's the
5 prisoners' affairs within the Palestinian law.

6 BY MS. MAXMAN:

7 Q. Within Palestinian law?

8 A. The law for the prisoners' affairs
9 and ex-prisoners.

10 Q. Are you referring --

11 MS. MAXMAN: Can we put up Tab
12 24, Elizabeth.

13 (Deposition Exhibit No. 3 was
14 marked for identification.)

15 MS. MAXMAN: I'm going to
16 represent for the record that this is a copy of
17 an English translation of the Prisoners and
18 Ex-Prisoners Law No. 19 of 2004. I do not have
19 a copy in -- wait. Maybe I do have a copy in
20 Arabic.

21 Actually, Elizabeth, if you scroll
22 back to the end of this document, we do have
23 the law in Arabic. Could you -- I'll tell when
24 you to stop. Okay, great. Okay. That's
25 perfect.

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1 affairs, and there is internal monitoring as
2 well.

3 Q. And when you say "general legal
4 affairs," you mean general legal affairs within
5 the PA?

6 A. Who would be the prisoners' affairs
7 staff.

8 Q. The prisoners' affairs lawyers?

9 A. Yes, and it is an important
10 department within the prisoners' affairs, and
11 they are the decision-making.

12 Q. To whom does Mr. Qadri Abu Bakr
13 report?

14 THE INTERPRETER: This is the
15 interpreter, I will repeat the question.

16 THE WITNESS: I assume -- I
17 assume the Prime Minister because he has the
18 level of a minister.

19 BY MS. MAXMAN:

20 Q. As of April 18, 2020 through the
21 present time, who or what determines the size
22 of the prisoners' affairs operating budget?

23 A. The general budget for the PA based
24 on the needs for all the ministries.

25 Q. Who sets that budget?

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1 A. The Ministry of Finance in
2 collaboration with all the ministries.

3 Q. As of April 18, 2020 through today,
4 what are the programs that the prisoners'
5 affairs -- that prisoners' affairs administers?

6 A. What programs are you referring to?
7 I don't know about that.

8 Q. Any programs administered by the
9 prisoners' affairs office.

10 A. I don't know. I don't know about
11 that. And this is something that the
12 prisoners' affairs knows about. I don't know
13 about this.

14 Q. What does the prisoners' affairs
15 office do?

16 A. It is composed of multiple
17 departments like any ministry or any
18 organization, starts from the minister and the
19 deputy minister, the general affairs, the legal
20 affairs department, which is -- which has a
21 main role, and the financial affairs. It is
22 multiple levels where it organizes and performs
23 the affairs of this organization.

24 Q. What purpose does the prisoners'
25 affairs office serve?

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1 MR. BERGER: Objection. This
2 is outside the scope of both your notice and of
3 jurisdictional discovery, but the witness may
4 answer to the extent of his knowledge.

5 THE WITNESS: The prisoners'
6 affairs welcomes the relatives and the families
7 of the prisoners, collect these documents, and
8 inspect these documents, and they have branches
9 in all the cities of the country. And once
10 they welcome the families, inspect the papers,
11 and make sure they are accurate, they will
12 direct them and send them, organize and send
13 them to the Ministry of Finance.

14 BY MS. MAXMAN:

15 Q. So the prisoner affairs office
16 determines whether certain prisoners are
17 entitled to monthly salaries?

18 MR. BERGER: Object to the
19 form of the question.

20 We need a translation here.
21 Hang on.

22 MS. MAXMAN: Hadeer, are you
23 going to translate? Hadeer, are you there? We
24 better go off the record for a moment.

25 THE VIDEOGRAPHER: We are now

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1 off the record. The time is 13:08 UTC time.

2 (Discussion held off the
3 record.)

4 THE VIDEOGRAPHER: We are
5 back on the record. The time is 13:10 UTC
6 time.

7 BY MS. MAXMAN:

8 Q. Who determines whether an individual
9 prisoner is entitled to a monthly salary?

10 MR. BERGER: Object to the
11 form of the question. You may answer.

12 THE WITNESS: The legal
13 department, after studying the papers, decides
14 whether the family of this prisoner is eligible
15 for the assistance or not.

16 BY MS. MAXMAN:

17 Q. And by the legal department, you
18 mean the legal department of prisoners'
19 affairs?

20 A. Yes, correct.

21 Q. And when the prisoners' affairs
22 legal department determines that the family or
23 the designee of a prisoner is entitled to
24 payment, they -- what do they do to ensure that
25 payment is made?

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1 A. After approving the payment, and
2 after seeing that it's eligible according to
3 the laws and regulations, they will include
4 this entitlement within the CD for the families
5 of the prisoners.

6 Q. And then the Ministry of Finance
7 makes the payments?

8 A. Yes.

9 Q. Who determines what amount each
10 prisoner or prisoner's family receives?

11 A. It's according to the scale of
12 salaries within the prisoners' affairs, and
13 what really determines the amount is the
14 duration, the actual duration of the presence
15 of the prisoner in prison.

16 Q. Who sets the scale?

17 A. The scale is within the main law of
18 the prisoners' affairs.

19 Q. Are some prisoners also Palestinian
20 Authority officers in security forces?

21 MR. BERGER: Object to the
22 form of the question. It's outside the scope
23 of the 30(b)(6) notice and of the scope of
24 jurisdictional discovery, but the witness may
25 answer to the extent of his personal knowledge.

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1 exceeds of the notice. Under Federal Rule of
2 Civil Procedure 30(c)(2), I instruct him not to
3 answer.

4 MS. MAXMAN: Let's go off the
5 record for a minute. We may need to call the
6 Judge.

7 MR. BERGER: Fine.

8 THE VIDEOGRAPHER: We are now
9 off the record. The time is 13:25 UTC.

10 (Discussion held off the
11 record.)

12 (Deposition Exhibit No. 4 was
13 marked for identification.)

14 THE VIDEOGRAPHER: We are
15 back on the record. The time is 13:29 UTC
16 time.

17 MS. MAXMAN: I have displayed
18 what is going to be entered into the record as
19 Exhibit 3, are we on, Madam Court Reporter?

20 THE COURT REPORTER: I believe
21 this will be 4.

22 MS. MAXMAN: Okay. Thank you.
23 Which is a series of documents Bates numbered
24 JD 00259 through 266. And, actually,
25 Elizabeth, I beg your pardon, can you move to

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1 the very last page of this exhibit, and then
2 enlarge it.

3 BY MS. MAXMAN:

4 Q. My question to the witness is, do
5 you recognize this document?

6 A. Let me see. Yes, I have the
7 document in front of me. I saw it.

8 Q. Okay. What is this document?

9 A. This is the allocation of -- monthly
10 allocation.

11 Q. Do you see at the top of the page it
12 says, prisoner salary statement?

13 A. It is the allocation for the
14 prisoner, because it comes from the IT, and the
15 general department and the finance department.
16 It is not the salary. It is the allocation for
17 the prisoner's family.

18 Q. What does that mean?

19 A. It's a document for the monthly
20 allocation for the prisoner's family by the
21 name of Norah.

22 Q. You are saying the prisoner's name
23 is Norah?

24 A. The prisoner is Mohammed Attia
25 Mahmoud Abu Wardeh, but Norah is one of his

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1 family members that has authorization to
2 receive the allocation.

3 Q. And am I correct that this is
4 Prisoner No. 9460?

5 A. As far as I see, yes, correct.

6 Q. Is each prisoner assigned a number?

7 A. I think so.

8 Q. There is another number at the top
9 of each page, 901065359. What does that mean?

10 A. It's the ID number.

11 Q. For the prisoner?

12 A. Yes, correct.

13 Q. Where did this document come from?

14 THE INTERPRETER: This is the
15 interpreter speaking. The response to the
16 question is, it's the identification number for
17 each individual.

18 This is the interpreter. When you
19 said "this document," you mean this document or
20 the identification number for the prisoner,
21 ma'am?

22 MS. MAXMAN: I mean the entire
23 document.

24 THE WITNESS: This document in
25 front of us is originated from the IT

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1 department, from the Minister of Finance.

2 BY MS. MAXMAN:

3 Q. And on that -- on Page 266 that we
4 were looking at, does this detail payments made
5 to Abu Wardeh's relative, Norah?

6 A. Correct.

7 Q. And the numbers down the right-hand
8 side under where it says salary, what
9 denomination of money is that?

10 A. It is the monthly allocation for the
11 prisoner's family in Israeli shekel currency.

12 Q. Are all of these documents kept in
13 Israeli shekels?

14 A. Correct. The currency that is used
15 in the salaries and the allocations is the
16 Israeli shekel.

17 Q. Who is Mohammed Attia Mahmoud Abu
18 Wardeh?

19 A. He is the prisoner.

20 Q. Okay. Now, if you go back -- if we
21 can scroll back, Elizabeth, through earlier
22 pages.

23 And my question is, all of these
24 rows have been redacted or blacked out. Do you
25 see that?

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1 A. Yes, I see it.

2 Q. If these rows were not blacked out,
3 what would be there?

4 MR. BERGER: Objection. The
5 witness may answer as to the type of
6 information found under those columns, but not
7 specific information found in those columns.

8 MS. MAXMAN: That's my
9 question.

10 THE WITNESS: It's the -- the
11 information that was hidden, it's the personal
12 information for the beneficiary, which is a
13 list of the information that was -- that the
14 accounting, the account number for the
15 beneficiary.

16 BY MS. MAXMAN:

17 Q. That's true for all of these pages?

18 A. The information which is hidden is
19 in regards to personal information.

20 Q. Who is Norah Bernan Andin Jabry?

21 A. Let me go back to see the
22 relationship. Norah is the wife of the
23 prisoner Mohammed Abu Wardeh.

24 Q. And the numbers next to her name --
25 90704499, is that her identification time?

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1 A. Yes, this is the ID number for
2 Norah.

3 Q. Okay. And then can we scroll back
4 to the last page again, Elizabeth. Right
5 there.

6 There is a column entitled salary.
7 Do you see that?

8 A. Yes.

9 Q. Whose salary is it? Is it Abu
10 Wardeh's salary?

11 A. This is the allocation for the
12 family of the prisoner Abu Wardeh. This is the
13 allocation for his family.

14 Q. And I think you said it's paid at
15 the end of every month?

16 A. It's paid with the payment of the
17 salaries and the wages at the end of each
18 month.

19 Q. And is it paid by wire transfer into
20 Norah's account?

21 A. Yes. The names in the CDs, the
22 allocation is wire transferred to the
23 beneficiary families of the prisoners in their
24 bank accounts.

25 Q. And on the left-hand side -- I'm

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1 sorry -- on the far right, there appears to be
2 a month and a year. Is that the month and the
3 year that each payment was made?

4 A. Yes, correct. This is a document
5 with the allocations starting with the month of
6 the year.

7 Q. So am I understanding correctly that
8 this document shows Ms. Norah's monthly salary
9 as Mr. Abu Wardeh's beneficiary from April 2020
10 through May of 2021?

11 A. This is correct.

12 Q. As of today, July of 2021, does
13 Mr. Abu Wardeh continue to receive a salary
14 paid to Ms. Norah?

15 A. I can see the payment up until May,
16 and I don't have any knowledge after that
17 because I don't have an insight on the salary
18 quarter -- and this is inspected at the end of
19 the month after bringing the documents for the
20 prisoners allocations.

21 MS. MAXMAN: I'm going take a
22 quick comfort break, or can we take a quick
23 comfort break. And then, Elizabeth, I'm going
24 to go to Tab 9 next.

25 MR. BERGER: Five minutes.

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1 THE VIDEOGRAPHER: We are now
2 off the record. The time is 13:47 UTC time.
3 (Discussion held off the
4 record.)

5 THE VIDEOGRAPHER: We are
6 back on the record. The time is 13:58 UTC
7 time.

8 MS. MAXMAN: Welcome back,
9 everyone. On the screen we have what I will
10 ask the court reporter to mark as Exhibit 5.

11 (Deposition Exhibit No. 5 was
12 marked for identification.)

13 BY MS. MAXMAN:

14 Q. For the record, it's Bates No.
15 Shatsky JD 01110 through JD 01142, and it
16 contains both the original which we are looking
17 at and the version that's translated into
18 English, which has the same Bates numbers with
19 a T at the end.

20 My first question to the witness is,
21 do you recognize this document?

22 A. Yes. Yes, I have seen this document
23 when I was preparing for the --

24 Q. Preparing, I couldn't hear you, sir?

25 A. While I was preparing the documents.

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1 Q. Okay. What is it?

2 A. This is the document for the
3 prisoner Mohammed Attia Mahmoud Abu Wardeh that
4 is a person in the objective of the prisoners'
5 affairs.

6 Q. Does it appear to be the same
7 prisoner that we were talking about with the
8 payment records that is Abu Wardeh?

9 A. Yes, it's obvious that it's the same
10 prisoner.

11 Q. Okay. Let's take a look at this
12 cover sheet. It says, Ministry of Detainees
13 and Ex-Detainees' Affairs. Is that prisoners'
14 affairs, is that the same entity we have been
15 talking about?

16 A. Yes, it's the same name.

17 Q. And it says, general administration
18 for administrative and financial affairs.

19 Do you see that?

20 A. That is correct.

21 Q. Why is that administration listed?

22 A. This is the added department, which
23 belongs to the Department of administrative and
24 financial that is part of the prisoners'
25 affairs. This document will be added later on.

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1 Q. Why while it be added to later on?

2 A. It will be saved and updated and to
3 have a copy and saved in the prisoners'
4 affairs.

5 Q. But right now it's in administrative
6 and financial affairs?

7 A. No. It's still in the prisoners'
8 affairs in a department called the
9 administrative and financial department that is
10 part of the prisoners' affairs.

11 Q. Okay. So this is not the financial
12 department where you are employed?

13 A. No. This is in the financial
14 affairs, but we don't have it in the financial
15 department.

16 Q. Just so I'm clear, you work for the
17 finance ministry?

18 A. Yes -- yes, correct, I work in the
19 finance ministry, and I am responsible or I am
20 the director/manager for the salaries in the
21 Palestinian Authority.

22 Q. But this document is a document from
23 prisoners' affairs but it's a subdepartment of
24 prisoners -- prisoners' affairs entitled
25 Administrative and Financial Affairs for

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1 Prisoners' Affairs?

2 A. Yes, correct.

3 Q. What does the No. 3203 mean on this
4 page?

5 A. I think this number belongs to the
6 prisoners' affairs. I think it's a number for
7 arrangement of this document when it's added to
8 be easy to find this document.

9 MS. MAXMAN: Okay. Now,
10 Elizabeth, can you scroll down to the next
11 page. And I am going to be addressing my next
12 questions to the next four pages. So I don't
13 know how we want to handle that.

14 Mr. Berger, do you have a paper copy
15 of this?

16 MR. BERGER: He has a paper
17 copy of what I believe is the entire prisoner's
18 file that contains the Bates numbers you're
19 talking about, in Arabic, though.

20 MS. MAXMAN: Okay. That's
21 fine. I just want to make sure we're on the
22 same page, as it were.

23 BY MS. MAXMAN:

24 Q. What are these documents being 111
25 through 1115?

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1 A. This is a document produced by the
2 Red Cross that documents that the prisoner is
3 present and himself and present to dispense the
4 allocations for the family.

5 Q. So this is a document from the Red
6 Cross proving that the prisoner is in prison?

7 A. Yes, correct.

8 Q. Okay. On these documents it says --
9 do you see where it says ID No. 90106535-9?

10 A. Yes, correct.

11 Q. Is that the same number -- well, we
12 have already determined that this is the same
13 person. Never mind.

14 And this document says that Mr. Abu
15 Wardeh was arrested by the Israeli authorities
16 on February 2002; correct? I beg your pardon,
17 it's on November 4, 2002.

18 A. Yes, correct. It's an Arabic
19 version, and the yellow portion of the document
20 says he was detained on the Day 4, Month 11,
21 2002. And he is sentenced.

22 Q. And he is sentenced to a life
23 sentence?

24 A. Yes, as it's documented in this
25 document.

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1 Q. Does the Palestinian Authority rely
2 on this document in its decision to make
3 payments to Mr. Abu Wardeh's designee?

4 A. This is decided by the prisoners'
5 affairs, but it's a legal official document
6 that is counted upon it.

7 Q. Okay. So prisoners' affairs relies
8 on it?

9 A. I think so.

10 Q. And on Page 1111, there is a
11 signature and a date; do you see that? Who
12 signed this?

13 MR. BERGER: I apologize.
14 There appear to be two sets of handwriting. Is
15 there one in particular you are directing him
16 to?

17 MS. MAXMAN: I'm looking at
18 the one that is dated 10/14.

19 THE WITNESS: This is an
20 internal affairs that belongs to the prisoners'
21 affairs that I don't know about, but I think
22 it's one of the attorneys.

23 BY MS. MAXMAN:

24 Q. Why would an attorney or an employee
25 of the prisoners' affairs be reviewing this

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1 speaking about that, was established before the
2 PA establishment.

3 BY MS. MAXMAN:

4 Q. And so that is why it used to be
5 under the PLO; correct?

6 A. I think so.

7 Q. When was it moved from the PLO to
8 the Ministry of Finance of the PA?

9 MR. BERGER: Objection go
10 ahead.

11 (The question was translated.)

12 MR. BERGER: Hold on.

13 Objection, it's outside the scope of this
14 designation. You will have two days on the
15 martyrs at the end of the week, but the witness
16 may answer to the extent of his personal
17 knowledge.

18 THE WITNESS: I don't have --
19 I don't have any knowledge about that.

20 BY MS. MAXMAN:

21 Q. Why is this particular prisoner, Abu
22 Wardeh, eligible for payments?

23 A. This is decided or determined by the
24 prisoners' affairs based on the rules and
25 regulations and the laws that is used to

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1 determine eligibility. But I think that he is
2 eligible for the allocation based on that he is
3 still in prison, and it's decided by the
4 prisoners' affairs.

5 Q. Just looking forward on 113 -- 1113
6 and 1114 and 1115, it appears that all three of
7 those also have certified updates. Are those
8 the updates that are necessary on a periodic
9 basis to continue to get payments?

10 A. I think so. And this is one of the
11 requirements for the prisoners and
12 ex-prisoners' affairs to be updated and to be
13 used for continuous allocation payments.

14 Q. I will turn your attention to Bates
15 No. 1117. And in the middle of the page, it
16 appears to say that the authorized beneficiary
17 is Norah, his wife; am I correct?

18 A. Yes. Document 1117 shows that the
19 beneficiary to receive the allocation is Norah
20 Ibrahim Ben-Cam Abu Wardeh, and the
21 relationship is the wife.

22 Q. And that is the same Norah that we
23 saw on the payment records is receiving the
24 payments; correct?

25 A. Yes, correct.

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1 1118?

2 A. This is determined by the regulation
3 that is used by the Detainees and Freed
4 Affairs.

5 Q. Do you know why Abu Wardeh was
6 imprisoned?

7 A. According to the document that I
8 have, there is nothing to indicate the reason.

9 Q. Is it possible -- well, you
10 testified that this document, 1120 through
11 1136, is kept as part of the file so that the
12 attorneys at prisoners' affairs could inspect
13 the document to decide whether the detainee is
14 eligible or ineligible; correct?

15 A. According to my knowledge, these
16 documents are inspected by the general
17 administration of the legal department to
18 determine whether, according to the
19 regulations, the benefits or the allocations
20 applies or doesn't apply.

21 Q. I'm going to represent to you that
22 this document, 1120 through 1137, is, as you
23 said, an indictment of Abu Wardeh for the
24 offense of intentional causation of death of,
25 among other things, in February of 2002, it

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1 MR. BERGER: Security.

2 THE WITNESS: Security and
3 they --

4 THE COURT REPORTER: I'm
5 sorry, I did not hear the word, or safety and
6 what?

7 THE WITNESS: Political or
8 security, and the prisoners' affairs and freed
9 is the ones who make the decision and mainly
10 the general benefit of the legal department who
11 makes this determination and decision.

12 MR. BERGER: We also think the
13 translation is criteria, not regulations.

14 BY MS. MAXMAN:

15 Q. So it's your testimony, Mr. Salem,
16 that the attorneys at the prisoners' affairs
17 department are the individuals who are
18 knowledgeable about how and why a determination
19 is made that Abu Wardeh's beneficiary is
20 eligible for payment; am I understanding you
21 correctly?

22 A. Within the laws and the criteria
23 that are used to determine in the prisoners'
24 affairs.

25 Q. So you did not talk to anybody from

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1 prisoners' affairs about what the laws and
2 criteria were in preparing for your deposition
3 as a corporate designee on behalf of the PLO
4 and the PA in this matter?

5 A. No, I spoke with the attorneys.

6 Q. Did you ask them what the criteria
7 were under the laws for becoming eligible for
8 payment?

9 A. Yes, I did.

10 Q. What did they tell you?

11 A. That the prisoner has to be detained
12 under either political or security, of course.

13 Q. That the prisoner has to be detained
14 because of political or security reasons?

15 A. Only on security and political basis
16 the allocations will be disbursed to his family
17 as long as he is still in prison.

18 Q. So are you saying that if Mr. Abu
19 Wardeh was imprisoned for shoplifting, he would
20 not be eligible for a payment?

21 A. According to my knowledge and
22 according to the criteria that is used, he is
23 not eligible for allocations if it was
24 shoplifting.

25 Q. What types of crimes would be

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1 question, and I ask that this question has
2 either a yes or no answer. Can you --

3 Are any payments to Mr. Abu Wardeh
4 being made because he committed an act of
5 terrorism? That's a yes or no question.

6 A. No.

7 Q. Is he in prison for having committed
8 an act of terrorism?

9 A. No.

10 Q. What act is he in prison for?

11 MR. BERGER: Objection, asked
12 and answered. You can answer.

13 THE WITNESS: He -- I'm sorry,
14 just to clarify -- he entered prison either
15 because of a security or a political act.

16 BY MS. MAXMAN:

17 Q. But not an act of terrorism?

18 A. Of course not.

19 Q. Were any of the payments in any of
20 the documents that you have turned over to us
21 to any of the prisoners or their designee made
22 because the person on whose payment is made --
23 on behalf of -- the person whose payments are
24 being made was imprisoned for committing an act
25 of terrorism?

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1 A. No.

2 Q. Okay. How do you know?

3 A. Because the act of terror is from
4 the Israeli point of view. For us, we don't
5 consider it, acknowledge it. It's either a
6 political or a security act.

7 Q. Mr. Salem, you're willing to
8 characterize Mr. Abu Wardeh's acts as political
9 or security acts; correct?

10 A. It is characterized by the legal
11 department and the prisoners' affairs.

12 Q. So but you're saying that the legal
13 department and prisoners' affairs are unwilling
14 to characterize these acts as terrorism?

15 A. We are -- we all don't characterize
16 the act as an act of terror. It is categorized
17 according to the Israeli side and point of
18 view.

19 Q. So if you are willing to
20 characterize it as one thing and unwilling to
21 characterize it as an act of terrorism, you
22 must know what it is; correct?

23 MR. BERGER: Objection,
24 argumentative.

25 THE WITNESS: The act of the

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1 family is either political or security, and for
2 that reason, it is eligible to dispense the
3 allocations for the family.

4 BY MS. MAXMAN:

5 Q. What is the act?

6 A. He had an act, I don't have the full
7 details of the act, but according to the
8 Israeli indictment, he had an act either
9 security or political. For that reason, it was
10 eligible by the prisoners' affairs to be
11 eligible for dispensing the allocation.

12 Q. So you would agree that the payments
13 were made to him by reason of his imprisonment
14 for the acts described in the indictment?

15 A. I don't agree. I don't agree. He
16 was entitled to the allocation because he was
17 in prison and not because of the rest of the
18 indictments.

19 Q. But if he were in prison for
20 shoplifting, you told me he would not be
21 eligible?

22 A. Definitely no.

23 Q. Why not?

24 A. Because the criteria or the
25 standards say it has either to be on a security

Abdel Jabbar Salem
July 27, 2021

1 or a political.

2 MS. MAXMAN: All right. Let's
3 go off the record.

4 THE VIDEOGRAPHER: We are off
5 the record. The time is 15:46 UTC time.

6 (Discussion held off the
7 record.)

8 THE VIDEOGRAPHER: We are
9 back on the record. The time is 15:48 UTC
10 time.

11 MS. MAXMAN: Mr. Berger?

12 MR. BERGER: Yes. On behalf
13 of Defendants, we designate this transcript as
14 confidential under Paragraph 6 of the
15 Protective Order in this case.

16 MS. MAXMAN: Do you have
17 anything further to add?

18 MR. BERGER: I have nothing
19 further.

20 MS. MAXMAN: Nor do I.

21 THE VIDEOGRAPHER: We are off
22 the record at 15:48 UTC time. This concludes
23 today's deposition. Thank you, everyone, and
24 take care.

25 (Discussion held off the

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1 COMMONWEALTH OF PENNSYLVANIA)
2 COUNTY OF ALLEGHENY) SS
3)

4 CERTIFICATE

5 I, Karen A. Nickel, a notary public in and
6 for the Commonwealth of Pennsylvania, do hereby
7 certify that the witness, ABDEL JABBAR SALEM,
8 was by me first duly sworn to testify the
9 truth, the whole truth, and nothing but the
10 truth; that the foregoing deposition was taken
11 at the time and place stated herein; and that
12 the said deposition was recorded
13 stenographically by me and then reduced to
14 typewriting under my direction, and constitutes
15 a true record of the testimony given by said
16 witness.

17 I further certify that I am not a
18 relative, employee or attorney of any of the
19 parties, or a relative or employee of either
20 counsel, and that I am in no way interested
21 directly or indirectly in this action.

22 IN WITNESS WHEREOF, I have hereunto set my
23 hand and affixed my seal of office this 29th
24 day of July 2021.

25 

Karen A. Nickel, Notary Public
Registered Professional Reporter
Certified Realtime Reporter

Abdel Jabbar Salem Volume II
July 28, 2021

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SHABTAI SCOTT SHATSKY, individually and as
personal representative of the Estate of
Keren Shatsky, J. ANNE SHATSKY, individually
and as personal representative of the Estate
of Keren Shatsky, TZIPPORA SHATSKY SCHWARZ,
YOSEPH SHATSKY, SARA SHATSKY TZIMMERMAN,
MIRIAM SHATSKY, DAVID RAPHAEL SHATSKY,
GINNETTE LANDO THALER, individually and as
personal representative of the Estate of
Rachel Thaler, LEOR THALER, ZVI THALER,
ISAAC THALER, HILLEL TRATTNER, RONIT
TRATTNER, ARON S. TRATTNER, SHELLEY
TRATTNER, EFRAT TRATTNER, HADASSA DINER,
Yael Hillman, STEVEN BRAUN, CHANA FRIEDMAN,
ILAN FRIEDMAN, MIRIAM FRIEDMAN, YEHIEL
FRIEDMAN, ZVI FRIEDMAN, and BELLA FRIEDMAN,

Plaintiffs,

-against-

THE PALESTINIAN LIBERATION ORGANIZATION
and THE PALESTINIAN AUTHORITY (a/k/a
"The Palestinian Interim Self-Government
Authority" and/or "The Palestinian National
Authority"),

Defendants.

-----X
Case No. 18-Civ. 12355

** CONFIDENTIAL **

CONTINUED REMOTE VIDEOTAPED DEPOSITION OF

ABDEL JABBAR SALEM

Wednesday, July 28, 2021

Reported by JEFFREY BENZ, CRR, RMR

JOB NO. 366126

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July 28, 2021

11:36 UTC

Videotaped Deposition of ABDEL JABBAR SALEM,
taken remotely, before Jeffrey Benz, a Certified
Realtime Reporter, Registered Merit Reporter and
Notary Public of the State of New York.

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A P P E A R A N C E S: (Ctd.)

ALSO PRESENT:

ELIZABETH V. BEZVERKHA, Cohen & Gresser

HADOOR AL AMIRI, Arabic Interpreter

COREY WAINAINA, Videographer

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2 of indictment regarding Prisoner Mohammed Abu
3 Warda. And on that basis, it is taken in
4 consideration for the allocation. And it's on a
5 political -- his crime is a political or
6 security background. Giving a notice that they
7 don't keep a copy.

8 Q. Is it your understanding, on behalf of
9 the Palestinian Authority, that Mr. Abu Warda is
10 in prison for the crimes described in the
11 indictment?

12 A. Yes, correct, according to the list of
13 indictment from the Israeli military code.

14 Q. And Mr. Abu Warda's beneficiary
15 receives an allocation because of his
16 imprisonment for crimes; is that correct?

17 A. Because of the presence in prison and
18 the accusations that were accused from the
19 Israeli court.

20 Q. That's the reason he is -- his family
21 is receiving the allocation?

22 A. And, of course, because of the need of
23 the family, allocation -- of course, because of
24 the need of the family, the allocation are
25 dispensed because the family needs it and

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2 paper set of the first Bates range you gave
3 him. We're trying to get the second Bates
4 range you gave him. 1190?

5 MS. MAXMAN: 1190 to 1214.

6 MR. BERGER: I believe he now has
7 that.

8 MS. MAXMAN: Okay. Thank you.

9 Q. I'll direct your attention to, first,
10 292293.

11 Am I correct that this is the
12 allocation payment for Hussam Abdul-Kader Ahmad
13 Halabi?

14 A. Yes, correct, according to the
15 attached documents.

16 Q. Okay. Now, turning your attention to
17 Bates number in Tab -- oh, I'm sorry.

18 MS. MAXMAN: Mr. Court Reporter, I
19 would like to mark Tab 12 as Exhibit 6.
20 Sorry. It's housekeeping. And Tab 13 as
21 Exhibit 7. I apologize.

22 (Prisoner salary statement, beginning
23 with Bates number JD 292-T, was marked
24 Salem Exhibit 6 for identification, as of
25 this date.)

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2 (Prisoner File for Hussam Abdul-Kader

3 Ahmad Halabi, Bates-numbered JD 1190-T to
4 1214-T, was marked Salem Exhibit 7 for
5 identification, as of this date.)

6 Q. So turning to Exhibit 7, I would
7 direct your attention to Bates number JD 1191.

8 A. Yes, ma'am. Yes.

9 Q. And am I correct that Mr. Halabi
10 received a life sentence?

11 A. Correct, according to the document.
12 Correct.

13 Q. Have you seen this document before,
14 sir?

15 A. Yes. I saw all the documents.

16 Q. And am I correct that this is the
17 prisoner file for Mr. Halabi?

18 A. Yes, correct.

19 Q. Now I would like to turn your
20 attention to Bates number JD 1201.

21 A. Yes.

22 Q. As I read this statement, it appears
23 that Mr. Halabi is single, correct?

24 A. Yes, correct.

25 Q. And the beneficiary of his allocation

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2 is the prisoner himself, correct?

3 A. Yes, correct.

4 Q. So am I correct that this allocation
5 to Mr. Halabi is not made for the benefit of
6 family outside prison that needs money to live
7 comfortably?

8 A. No. No.

9 Q. Why not?

10 A. No, because there is some prisoners
11 who has elderly parents who cannot go to the
12 bank to withdraw the money, and they give
13 authorization to withdraw the money and to use
14 it to live. So there are certain prisoners who
15 have -- his parents are elderly or he has
16 brothers or sisters who he's...

17 Q. But they're not indicated on the
18 statement.

19 THE INTERPRETER: I'm sorry, ma'am.
20 Can you repeat that.

21 Q. But they're not indicated on the
22 statement, correct?

23 A. Yes, correct. Because there are
24 certain times where their beneficiaries make
25 authorization to the prisoner himself, to the

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2 attorneys, or the money got transferred directly
3 to the account, and it's not necessary for the
4 names to be present in the documents. And,
5 these allocations, goes to the beneficiaries.
6 And the names are not stored in the prisoner's
7 alliance.

8 We have a -- (inaudible).

9 Never mind. Withdrawn.

10 MS. MAXMAN: Mr. Berger, I can't hear
11 you.

12 MR. BERGER: I said we had a question
13 about the translation, but it's been sorted
14 out. Thank you.

15 Q. Turning to Bates numbers -- turning to
16 Bates numbers 1205 through 1214.

17 Am I correct, you're looking at those
18 pages that are in Hebrew, correct?

19 A. These pages or documents are in Hebrew
20 language.

21 Q. And, therefore, am I correct to assume
22 that you cannot read them?

23 A. Yes. Correct. I cannot read it. I'm
24 only looking at the page number, 1205, 1206,
25 1207.

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2 Q. How do you -- how do you know his
3 parents are alive?

4 A. This definitely -- this will be making
5 sure of by the Prisoners Alliance. And other
6 than that, the money would not have been
7 transferred to the account.

8 This is what the Prisoners Alliance
9 assured me.

10 Q. When you say "Prisoners Alliance," do
11 you mean Prisoners Affairs?

12 THE INTERPRETER: Sorry. Prisoners
13 Affairs.

14 Q. Is it your testimony that Prisoners
15 Affairs would not continue to pay the salary if
16 he did not have a family to support?

17 A. Yes, definitely, and this is what they
18 assured me with.

19 Q. So Mr. Halabi is receiving his salary
20 because he is imprisoned by the Israeli
21 government. Correct?

22 A. He was in prison, and he was working
23 as an employee. And he was imprisoned because
24 of the Israel government.

25 Q. And the reason that he is in prison is